

Commonwealth of Massachusetts

Division of Insurance

2017 Annual Report

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1 – About the Division of Insurance

1. Mission

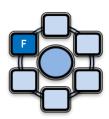
The Division of Insurance ("Division") administers the Commonwealth's insurance consumer protection laws through its regulation of the insurance industry. The Division's primary mission is to monitor the solvency of its licensees in order to promote a healthy, responsive and willing marketplace for consumers who purchase insurance products. The Division licenses insurance companies and producers, reviews and approves policy rates and forms, and coordinates the rehabilitation of financially troubled companies and the takeover and liquidation of insolvent insurance companies. The Division also investigates and responds to consumer inquiries and complaints, enforces state insurance laws and regulations and provides the public with accurate and unbiased information regarding various types of insurance coverage through its website and assorted publications. The Division safeguards consumer protection interests by providing accurate and unbiased information to enable consumers to make informed decisions, and intervenes on behalf of consumers who believe they have been victimized by unfair business practices.

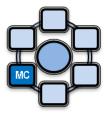
1.2 Primary Activities

The Division protects consumers and promotes a fiscally sound insurance marketplace through the performance of six primary activities. Taken together, these activities represent the core of effective insurance regulation.









License Insurance Companies (CL)

The process of licensing insurance companies promotes a marketplace of solvent, fiscally sound companies through the review and analysis of filings and financial statements.

Examining the Financial Condition of Insurance Companies (F)

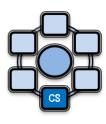
The Division monitors the financial condition of insurance companies through quarterly financial analysis. The analysis process provides an early warning of possible financial problems, so that appropriate regulatory action can be taken before the extreme situation of insolvency occurs. The monitoring process also includes periodic on-site financial examinations of all domestic companies to value assets, determine liabilities and verify compliance with applicable statutes and regulations.

Examine the Market Conduct of Insurance Companies (MC)

Beyond the financial health of an insurer, the Division also examines how the company interacts with policyholders and potential customers. The market conduct process looks beyond the financial condition of a company and examines business practices such as policy underwriting and rating, cancellations and non-renewals, claim settlements, original insurance applications and advertising materials. The goal of these examinations is to confirm that Massachusetts consumers are fairly treated in accordance with the terms of their insurance policy contract.







Regulate Insurance Policy Forms, Rates and Programs (SRB)

By reviewing and approving insurance policy forms, rules, rates and associated program procedures and operations, the Division verifies that the insurance products sold to Massachusetts consumers by licensed insurance companies comply with the Commonwealth's laws and regulations.

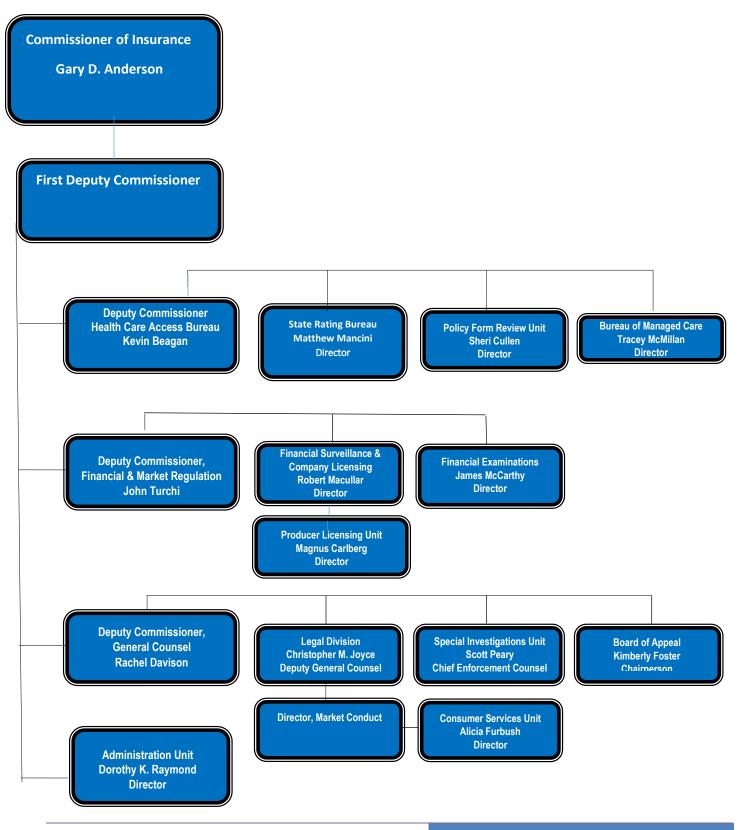
License Insurance Producers and Others (PL)

The process of licensing insurance producers and other key participants in the insurance industry allows the Division to promote a marketplace in which individuals and firms engaging in the business of insurance are qualified and are conducting business in compliance with the Commonwealth's laws and regulations.

Investigate Insurance Consumer Complaints (CS)

The Division provides insurance consumers with a non-judicial alternative for pursuing complaints against insurance companies and insurance producers, by investigating consumer complaints within its jurisdiction and consistent with Massachusetts' laws.

1.3 Organizational Chart (as of 12-31-2017)



1.4 Human Resources

The Administration Department works closely with the Human Resources Department in the Office of Consumer Affairs and Business Regulation on all aspects of hiring, managing, training and promoting the Division's workforce. In addition, the Administration Department works with the Division's Labor Relations Counsel to respond to various labor relations issues, including employee complaints and grievances. As of December 31, 2017, the Division employed the equivalent of 126.8 full time staff.

Division of Insurance
Staffing Levels
1978 -- 233
2017 -- 127

1.5 Budget, Revenue & Assessments

Budget

The Division receives an annual budget appropriation from the Massachusetts Legislature to account 7006-0020, the value of which is then assessed back to the entities the Division regulates. The Division also has three trust accounts created by statute: the Worker's Compensation Rating Bureau Trust Account - 9222-7650; the State Rating Bureau Medical Malpractice Trust Account - 9222-7900; and the Medical Malpractice Analysis Bureau Trust Account - 9222-7500. These accounts are funded through direct assessments on the insurance industry.

Revenue & Assessments

The Division collects revenue from individual consumers, licensees and companies as part of its statutory responsibilities. The Division also bills various assessments to the insurance industry, and collects these funds for deposit into the Commonwealth's General Fund. Most revenue collected from individuals and companies comes from license application and filing fees, as well as fines and penalties imposed for licensee violations of appropriate standards of conduct.

The Commissioner of Insurance ("Commissioner") is required by the Massachusetts General Laws to annually bill assessments to insurance companies for various purposes. In Fiscal Year 2017, the Division billed 12 assessments totaling more than \$61 million. The revenue collected from these assessments funds the operation of several state agencies, including the Division of Insurance; the Registry of Motor Vehicle's Merit Rating Board; the Department of Fire Services and various fraud prevention programs in the Attorney General's Office.

Taken together, the revenue and assessments collected annually by the Division are typically nine to ten times greater than the Division's annual budget appropriation.. In Fiscal Year 2017, the Division collected total revenue in excess of \$177 million.

Division of Insurance Budget for Fiscal \$14,675,000

Year 2017

Total Revenue and Assessment
Collections for the General Fund for

Fiscal Year 2017

Budget, Revenue and Assessment figures on this page are from the 2017 Fiscal Year- July 1, 2016 through June 30, 2017.

Revenue & Assessments	Amount
Revenue	
Annual Statement/Securities	\$201,720.00
Appointment Licenses	\$54,100,199.20
Appraiser Exam	\$18,650.00
Appraiser Licenses	\$258,675.00
Auto Club Licenses	\$24,225.00
Charters	\$64,189.00
Company Licenses	\$308,721.00
Dept. of Public Health – Lead Paint Surcharge	\$1,547,201.00
Domestic Company Exams	\$935,510.00
Fines & Penalties	\$1,578,254.87
Fraternal Licenses	\$8556.00
HMO Application Fee	\$2000.00
Letters of Certification	\$46,678.00
Life Insurance Valuations	\$726,546.67
Loss of License Filing Fee	\$180,965.00
Policy Form Filing Fee	\$576,250.00
Preferred Provider Arrangement Application Fee	\$17,000.00
Producer Licenses	\$12,852,327.51
Rate Filing Fee	\$689,400.01
Rating Organization	\$25.00
Service of Process	\$5545.00
Special Brokers Tax	\$39,349,128.20
Surcharge Appeal Filing Fee	\$1,525,389.00
Miscellaneous	\$188,697.81
Total Revenue	\$115,205,853.27

Assessments

Attorney General	\$1,971,146.66
Attorney General (Workers' Compensation)	\$572,752.31
Auto Insurance Bureau	\$572,752.31
Department of Fire Services	\$27,520,462.65
Division of Insurance Fraud Trust	\$321,206.40
Division of Insurance Operations	16,644,970.20
Health Care Access Bureau	\$1,895,458.03
JUA Medical Malpractice	\$341,594.44
Merit Rating Board	\$9,695,864.13
Special Maintenance Account	\$1,063,822.59
State Rating Bureau	\$1,040,387.60
SRB Medical Malpractice	\$252,810.26
SRB Workers' Compensation	\$556,076.44
Total Assessments	\$62,449,304.02
Total Revenue & Assessments	\$177,655,157.29

Insurance Written in Massachusetts

According to a 2017 National Association of Insurance Commissioners ("NAIC") survey based on 2015 data, Massachusetts ranks 11^{th} among 56 U.S. states and territories with respect to premium written by its domestic insurers.

Considering that the Commonwealth's population is much smaller than the other states in the top eleven, Massachusetts shoulders a disproportionate share of the responsibility to regulate U.S. insurers. In fact, by most measures of regulatory performance, the Massachusetts Division of Insurance does more with less and, compared to most other states, represents a relative bargain for taxpayers, policyholders and insurers in the Commonwealth.

2017 Staffing & Budget N	National Rank*:
Premium Volume	12th
Full Time Employees	22 nd
Annual Budget	31st
Budget as Percentage of Total Premium	48 th

1.6 The Massachusetts Insurance Marketplace

Massachusetts Domestics

Hundreds of insurance companies are licensed to do business in the Commonwealth of Massachusetts, and each year these companies write tens of billions of dollars in premium in Massachusetts. The Division licenses each of these companies and regulates all aspects of their business conduct. The Division is responsible for monitoring the solvency of companies domiciled in Massachusetts, which thereby protects the Commonwealth's citizens, as well as other policyholders across the nation and around the world.

In 2017, Massachusetts was the domicile state for:

- 48 property and casualty insurers;
- 16 life and accident and sickness insurers;
- 14 health organizations;
- 2 lodge fraternal benefit associations;
- 1 title insurer;
- 20 workers' compensation self-insured groups;
- 6 residual market pools; and
- 147 fraternal benefit and mutual aid societies.

In 2017,
Massachusetts
was the
Principal
Regulator for:
81 Insurance
Companies
&
173 Related
Organizations

Company Market Share

Among the scores of insurance products marketed and sold in Massachusetts, certain lines of insurance represent the majority of premium paid and the greatest number of policies issued. Premium written under Accident and Health, Homeowners, Life, Automobile, and Workers' Compensation policies makes up approximately 30% of all premium written in the Commonwealth. Most lines of insurance operate within diverse markets, comprised of insurers domiciled in Massachusetts and those domiciled in other states, but licensed to write business in Massachusetts. Consumers may choose from among many companies competing for their business.

Top 10 Companies of Selected Market Sectors

Top 10 Accident & Health Insurance Companies* United Healthcare Insurance Co 34.9% Aetna Life Insurance Co 7.7% Metropolitan Life Insurance Co 6.2% Cigna Health & Life Ins Co 6.2% Unum Life Ins Co of America 4.6% Guardian Life Ins Co of America 2.5% Genworth Life Insurance Co 2.2%

Top 10 Auto Insurance Companies		
	Commerce Insurance Co	23.9%
	Safety Insurance Co	8.7%
	Government Employees Ins Co	8.5%
	Arbella Mutual Insurance Co	7.9%
	Liberty Mutual Insurance Co	6.5%
	Plymouth Rock Assurance Co	6.4%
	LM Gen Insurance Co	4.3%

Top 10 Home Insurance Companies Citation Insurance Co 8.5% Arbella Mutual Insurance Co 5.9% Commerce Insurance Co 5.1% Merrimack Mutual Fire Insurance Co 3afety Indemnity Insurance Co 4.5% Safety Indemnity Insurance Co 4.3% Amica Mutual Insurance Co 4.0%

Insurance Companies		
Associated Industries of MA Mut Ins	8.0%	
ACE America Insurance Co	4.6%	
New Hampshire Insurance Co	3.8%	
Travelers Indemnity Co of CT	3.4%	
Travelers Indemnity Co of Amer	3.4%	
Travelers Indemnity Co	3.3%	
Atlantic Charter Insurance Co	3.0%	

Top 10 Life Insurance Companies		
7.7%		
6.7%		
5.7%		
5.5%		
4.6%		
4.4%		
4.3%		
4.2%		

Commerce Insurance Co	10.8%
Safety Insurance Co	4.5%
Arbella Mutual Insurance Co	4.0%
Government Employees Ins Co	3.2%
Liberty Mutual Insurance Co	3.1%
Plymouth Rock Assurance Corp	2.4%
Metropolitan Property & Cas Ins Co	2.0%
LM Gen Insurance Co	2.0%

^{*} Most health insurance is offered through Health Maintenance Organizations ("HMOs"). For HMO market share data, see Appendix C.

2 - Financial Surveillance & Company Licensing

2.1 Mission

The primary mission of the Financial Surveillance and Company Licensing Section is to monitor the financial solvency of Massachusetts' domestic insurers, in order to ensure a healthy and competitive insurance market in the Commonwealth.

2.2 2017 Goals

- Monitor the solvency of all insurance companies domiciled in Massachusetts. Complete quarterly and annual analyses of all files within the deadlines delineated in the NAIC Accreditation Guidelines. Hold annual meetings with senior company management, which could include members of audit committees and boards of directors.
- Maintain Accreditation by the NAIC. The NAIC Accreditation
 program provides a process whereby solvency regulation of multistate insurance companies can be enhanced and adequately
 monitored with emphasis on: adequate solvency laws and
 regulations to protect consumers and guarantee funds; effective and
 efficient financial analysis and examination processes, and
 appropriate organizational and personnel practices.
- Process applications from insurance companies seeking to engage in the insurance business in the Commonwealth, or to amend their existing license, in order to provide for a solvent and competitive insurance market.
- Oversee insurance company transactions and practices including demutualizations, issuance of surplus notes, surplus note interest and principal payments, ordinary and extraordinary dividend requests, mergers and acquisitions, mutual affiliations, quasireorganizations, additional reserving requirements, corporate governance practices, and the creation of new Massachusetts domestic insurers.









2.3 Primary Activities

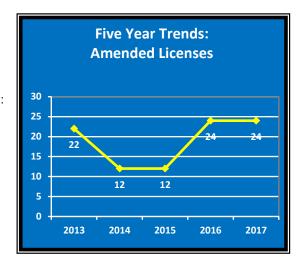
The Financial Surveillance and Company Licensing staff analyzes company annual statement filings, processes license certifications and manages the collection of related revenue, which totaled approximately \$660,000 in 2017.

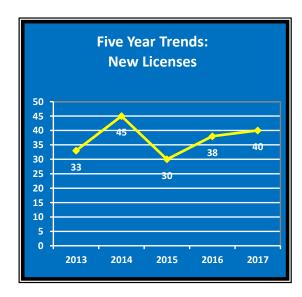
Financial Surveillance

The Financial Surveillance Section monitors the solvency of domestic and foreign (domiciled in another state) insurance companies. There are currently 1,756 insurance companies licensed, authorized, or eligible to transact insurance business in the Commonwealth. Included in this number are:

- Life insurers
- Accident and health insurers
- Property and casualty insurers
- Health maintenance organizations
- Non-profit hospital and medical service corporations
- Dental service plans
- Vision service plans
- Fraternal benefit societies
- Title insurers
- Risk retention groups
- Self-insurance groups
- Surplus lines insurers
- Eligible Alien Unauthorized Insurers
- Reinsurers
- Service contract providers, and
- Life settlement companies.

As of December 31, 2017, there were 81 insurance companies domiciled in Massachusetts. Of the 81 Massachusetts domestic insurers, 48 were property and casualty insurers, 16 life insurers, 14 health insurers, two fraternal benefit societies and one title insurer These insurers wrote gross premiums of approximately \$56 billion during 2017.





In 2017, a Division financial analyst completed a comprehensive desk audit of each of these Massachusetts domestic companies which was reviewed by a manager. These desk audits consist of more than 20 separate, detailed analyses for each company including an in-depth review of the company's Annual Statement and their investment and reinsurance portfolios, reserving analysis, income and cash flow statements and balance sheets. The Division reviews the Statement of Actuarial Opinion, the Management's Discussion and Analysis, holding company filings and independent CPA Audits in great detail. Lastly, Division staff and managers review each domestic insurer's quarterly statement, which is similar to the Annual Statement, and reviews and tracks each domestic insurer's national ratings. Each of these tasks helps the Division to closely monitor a company's solvency.

Company Licensing

The Company Licensing staff reviews and processes all applications from insurers seeking to obtain or amend licenses to transact insurance business in the Commonwealth. The Division participates in the NAIC Uniform Certificate of Authority Application ("UCAA") process. The UCAA consists of 14 parts, which allow the Division to review the applicant's solvency, management team and experience in the insurance industry. Information compiled by the NAIC, as well as input from the domestic regulators, also has a part in the review process.

In 2017, the Company Licensing Section:

- Issued 22 new insurance company licenses and 24 amended insurance company licenses;
- Approved four companies as eligible to accept surplus lines placements;
- Approved three companies as accredited reinsurers;
- Approved three companies as certified reinsurers;
- Approved two companies as life settlement providers; and
- Issued Certificates of Authority to three home service contract providers.

In addition, two companies became eligible alien unauthorized insurers in 2017.

New Licenses, Authority or Eligibility					
Accredited Reinsurers	Life, Accident & Health Insurers	Property & Casualty Insurers			
High Point Preferred Insurance Company	Auto-Owners Life Insurance Company	ALPS Property & Casualty Insurance Company			
Palisades Safety and Insurance Association	Lumico Life Insurance Company	Everest Denali Insurance Company			
River Thames Insurance Company Limited	Merit Health Insurance Company	Everest Premier Insurance Company			
Certified Reinsurers	Motorists Life Insurance Company	Federated Reserve Insurance Company			
Arch Reinsurance Ltd.	Nebraska Life Assurance Company	JM Specialty Insurance Company			
Hannover Ruck SE	State Mutual Insurance Company	Kingstone Insurance Company			
Hiscox Reinsurance Company (Bermuda) Ltd.	United Heritage Life Insurance Company	MAG Mutual Insurance Company			
TransRe London Limited	Surplus Lines	MEMIC Casualty Company			
Munchener Ruckversicherungs-Gesellshaft Aktiengesellschaft	GeoVera Specialty Insurance Company	OBI American Insurance Company			
Eligible Alien Unauthorized Insurers	Golden Bear Insurance Company	Plateau Casualty Insurance Company			
Lloyd's Syndicate #1975	HDI Specialty Insurance Company	Sompo America Fire & Marine Insurance Company of America			
Lloyd's Syndicate #3268	Home Service Contract Providers	Starr Specialty Insurance Company			
Life Settlement Providers	GameStop, Inc.	Third Coast Insurance Company			
Cambridge Life Management, LLC	HSB Secure Services	U.S. Underwriters Insurance Company			
Life Capital Group, Inc.	JM Care Plan, Inc.	White Pine Insurance Company			

2.4 Notable Transactions

There were several changes to the composition of Massachusetts' domestic insurance market in 2017. These included the following:

Atlantic Charter Insurance Company

• The Company paid an extraordinary dividend of \$15 million to stockholders.

New England Life Insurance Company

• On August 4, 2017 the Company's separation from MetLife was completed. Several new agreements were reviewed by the Division to reflect various services and arrangements with the parent, Brighthouse Financial, Inc., and affiliated companies.

Blue Cross Blue Shield of Massachusetts, Inc. and Blue Cross Blue Shield of Massachusetts HMO Blue, Inc.

- On December 18, 2017, Blue Cross Blue Shield of Massachusetts, Inc. paid off a surplus note totaling \$100 million to Blue Cross Blue Shield of Massachusetts HMO Blue, Inc.
- On December 18, 2017, Blue Cross Blue Shield of Massachusetts, Inc. issued a surplus note totaling \$285 million to Blue Cross Blue Shield of Massachusetts HMO Blue, Inc.

Hingham Mutual Fire Insurance Company

The Company sold its home office facilities and is renting commercial space.

Commonwealth Annuity & Life Insurance Company

- On December 29, 2017, the Company received a \$125 million extraordinary dividend from Forethought Life Insurance Company (FLIC), which included a \$90.8 million transfer of invested assets.
- On December 29, 2017, the Company made a \$100 million capital contribution to Accordia Life & Annuity Insurance Company which included a \$47.5 million transfer of invested assets.
- On December 29, 2017, the Company received a non-cash capital contribution for the remaining 5% ownership of FLIC and Forethought National Life Insurance Company valued at \$67.4 million.
- On December 29, 2017, the Company made a \$50 million capital contribution to First Allmerica Financial Life Insurance Company which included a \$25.9 million transfer of invested assets.
- On December 29, 2017, the Company received a \$50 million cash capital contribution from Global Atlantic Company (Finco).
- On December 29, 2017, the Company, its parent Finco and its subsidiary FLIC, restructured existing surplus notes. The Company canceled its existing surplus note with Finco with carrying value of \$255 million and an interest rate of 4.75%, and issued a new surplus note to Finco with a face amount of \$620 million and an interest rate 5.75%. As consideration for this increased surplus note, the Company received a surplus note issued by FLIC with a face amount of \$365 million and an interest rate of 6.5%, which had previously been issued to Finco.

• On June 30, 2017, the Company received a \$180.5 million extraordinary cash dividend from FLIC having received approval from the Indiana Department of Insurance.

First Allmerica Financial Life Insurance Company

 On December 29, 2017, the Company received a \$50 million capital contribution from its parent, Commonwealth Annuity & Life Insurance Company, which included a \$25.9 million transfer of assets.

Massachusetts Mutual Life Insurance Company

- In November 2017, the Company announced its 2017 policyholder dividend policy. It expects to pay policyholder dividends of \$1.6 billion in 2018.
- On March 20, 2017, issues \$475 million 60-Year Surplus Notes with interest at 4.90%.
- August 17, 2017 MassMutual International LLC (MassMutual International) Massachusetts Mutual Life Insurance Company's (MassMutual) international insurance holding company—and Yunfeng Financial Group (Yunfeng FG, HKSE: 376) have entered into a transaction in which MassMutual International will sell Hong Kong-based MassMutual Asia Ltd. (MassMutual Asia) to Yunfeng FG and several Asia-based investors. Under the terms of the transaction announced today, MassMutual International will receive approximately USD 1.01 billion in cash (HKD 7.9 billion) and 800 million shares of Yunfeng FG at HKD 6.50 per share (total value of approximately USD 668 million), which is equivalent to approximately 24.8 percent of the expanded share capital of Yunfeng FG.

Hospitality Insurance Company

• Richard E. Welch replaced John W. Tympanick, as President & CEO during 4th Quarter 2017.

Norfolk and Dedham Mutual Fire Insurance Company

• The Company paid off a \$1.7 million surplus note.

Electric Insurance Company

• The Company paid an extraordinary dividend of \$50 million to stockholders in 2017.

Tufts Associated Health Maintenance Organization, Inc.

- In October 2017 there was a corporate restructuring, resulting in a new ultimate controlling entity, Tufts Health Plan, Inc. As part of this restructuring, TAHMO distributed its investment in Tufts Health Public Plan, Inc. to Tufts Health Plan, Inc. This distribution was considered an extraordinary dividend by MA-DOI.
- In December 2017 the Company paid a \$55 million extraordinary dividend to Tufts Health Plan, Inc.

 The Company formed a new subsidiary, CarePartners of Connecticut, Inc.; which is a joint venture between Tufts Health Plan and Hartford HealthCare, and will provide health insurance to Connecticut residents who are Medicare eligible.

Tufts Health Public Plans, Inc.

- In October 2017 there was a corporate restructuring, resulting in a new ultimate controlling entity, Tufts Health Plan, Inc. As part of this restructuring, Tufts Associated HMO distributed its investment in Tufts Health Public Plan, Inc. to Tufts Health Plan, Inc. and this distribution was considered an extraordinary dividend by MA-DOI.
- The Company began writing business in Rhode Island as a result of an August 2017 contract with the Rhode Island Executive Office of Health and Human Services to provide Medicaid Managed Service in Rhode Island.

Tufts Insurance Company

• In October 2017 there was a corporate restructuring, resulting in a new ultimate controlling entity, Tufts Health Plan, Inc.

Liberty Mutual Insurance Company

• The Company completed its acquisition of 100 percent ownership interest in Ironshore Inc., a premier global specialty company, from Fosun International Limited.

Minuteman Health, Inc.

• Effective August 2, 2017, Minuteman Health, Inc. was placed in rehabilitation.

Primerica Life Insurance Company

• Effective December 28, 2017, the Division approved the request to redomesticate the Company to Tennessee.

Massachusetts Vision Service Plan, Inc.

• Effective October 1, 2017, the Company merged into Vision Service Plan Insurance Company (Ohio), making Vision Service Plan Insurance Company the surviving company.

3 - Financial Examinations

3.1 Mission

The Financial Examination Section's mission is to ensure the financial health of insurance companies, and thereby protect consumers who purchase insurance, by conducting statutory financial examinations of Massachusetts' domestic insurers.

3.2 2017 Goals

Complete

• Conduct financial examinations of domestic insurance companies to protect policyholders' and claimants' rights, by ensuring that they can do business with financially solvent companies.

Complete

 Maintain Accreditation by the NAIC. Impose qualitative standards in the regulation of insurance. Ensure that our domestic insurance companies operate and provide insurance coverage to policyholders and consumers with the least amount of regulatory oversight and involvement from other U.S. jurisdictions, and thus with the least cost to them.

Complete

Conduct financial examinations in compliance with the NAIC
 Financial Condition Examiners Handbook to ensure timely and
 regular examination reviews that are based on a substantive "risk focused" exam approach toward proper allocation of examination
 resources within the financial operations of our domestic insurance
 companies.

3.3 Primary Activities

Financial Examinations

The Division conducts financial examinations in accordance with the NAIC's Financial Condition (E) Committee standards, the requirements of the NAIC Financial Condition Examiner's Handbook, the Division's own examination standards and Massachusetts' General Laws. The principal focus of an examination is the most recent calendar year's activity, but the Division reviews transactions both prior and subsequent to the "as of" examination date, when deemed appropriate.

In addition to reviewing an insurer's financial condition, the examination also reviews the company's:

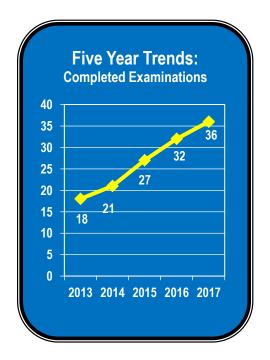
- Business Plans and Policies;
- Corporate Governance;
- Corporate Records;
- Reinsurance Programs;
- Systems and Controls Environment;
- Current and Prospective Risks; and
- Disaster Recovery Plan.

In addition to this list, the review also includes other pertinent matters, so to provide a reasonable assurance that the company is in compliance with applicable laws, rules and regulations. The Division considers the concepts of materiality and risk in planning and conducting an examination, and directs its examination efforts accordingly.

In 2017, the Financial Examination Section completed routine statutory examinations of thirty-six insuring organizations. These companies produced \$9.8 billion in premium nationwide - \$9.4 billion in Massachusetts.

The NAIC Financial Regulation Standards & Accreditation (F) Committee has a standard known as the "18 Month Rule." This standard establishes a general rule that comprehensive financial examinations conducted by state insurance departments should be completed, and reports issued, within eighteen months of the examination's "as of" date. Exceptions to this rule are permitted for reasonable justification, and an extension of up to twenty-two months is allowed before the state is required to roll the "as of" date of a re-initiated exam forward one year.

2017 Statutory Examinations Life, Accident & 2 Health Insurers Property & Casualty 8 Insurers Self-Insured Groups 16 Health Organizations 8 Residual Market 2



The Financial Examination Section conducted nine full-scope financial examinations with an "as of" date of December 31, 2014 and twenty-seven examinations with an "as of" date of December 31, 2015. Each of these examinations was completed by June 30, 2017, within the "18 Month Rule" timeframe noted above. Twenty-two financial examinations were in progress at year's end, representing approximately \$9.2 billion in premium nationwide - \$9.0 billion in Massachusetts.

Examination Reports Issued in 2017				
	US Direct Premium	MA Direct Premium	Surplus	
Property & Casualty Insurers				
Arbella Indemnity Insurance Company	12,615,000	12,197,000	14,721,000	
Arbella Mutual Insurance Company	610,885,000	610,885,000	510,495,000	
Arbella Protection Insurance Company	201,037,000	172,058,000	90,440,000	
Atlantic Charter Insurance Company	39,341,000	34,297,000	49,299,000	
Barnstable County Insurance Company	2,400,000	2,400,000	20,607,000	
Barnstable County Mutual Insurance Company	26,555,000	26,555,000	79,959,000	
Endeavour Insurance Company	4,265,000	4,265,000	5,965,000	
Independence Casualty Insurance Company	19,831,000	19,831,000	4,498,000	
Health Insurers				
Blue Cross and Blue Shield of Mass. HMO Blue, Inc.	4,356,239,000	4,356,239,000	1,089,583,000	
Blue Cross and Blue Shield of Massachusetts, Inc.	2,579,556,000	2,579,556,000	618,667,000	
CeltiCare Health Plan of Massachusetts	222,764,000	222,764,000	55,700,000	
Dental Services of Massachusetts, Inc.	260,414,000	260,414,000	351,871,000	
DSM Insurance Company of MA	8,117,000	8,117,000	6,677,000	
Health New England, Inc.	900,319,000	896,159,000	40,109,000	
HNE Insurance Company , Inc.	363,000	363,000	4,901,000	
Massachusetts Vision Service Plan, Inc.	32,914,000	32,914,000	13,975,000	

Life, Accident & Health Insurers				
Berkshire life Insurance Company of America	515,189,000	22,670,000	207,942,000	
Centre Life Insurance Company	21,824,000	911,000	94,477,000	
Residual Market				
Massachusetts Insurers Insolvency Fund	0	0	0	
Massachusetts Capital Resource Company	0	0	0	
Self-Insured Groups				
Associated Builders & Contractors MA Workers' Comp. Corp. Self-Insurance Group	0	3,354,000	0	
Automotive Industries Compensation Corp.	0	6,706,000	0	
Commonwealth Transportation Compensation Corp.	0	3,929,000	0	
Heating Ventilation Air Conditioning Compensation Corp. (HVAC)	0	1,201,000	0	
Independent Schools Compensation Corp.	0	9,140,000	0	
Massachusetts Bay Self-Insurance Group	0	2,979,000	229,000	
Massachusetts Care Self-Insurance Group, Inc.	0	5,123,000	0	
Massachusetts Education & Government Association Property-Casualty Group, Inc. (MEGA)	0	14,335,000	863,000	
Massachusetts Healthcare Self-Insurance Group, Inc.	0	5,608,000	0	
Massachusetts High Technology Self-Insurance Group	0	863,000	0	
Massachusetts Manufacturing Self-Insurance Group, Inc.	0	4,110,000	100,000	
Massachusetts Retail Merchants Workers' Compensation Corp.	0	19,776,000	0	
Massachusetts Trade Self-Insurance Group	0	3,617,000	0	
New England Educators Insurance Assoc. Compensation (NEEIA)	0	7,605,000	0	
School Transportation Association of MA Workers' Compensation Self-Insurance Group (STAM)	0	3,816,000	0	
Self-Insured Lumber Business Association, Inc.	0	3,568,000	40,000	
TOTALS	\$9,814,628,000	\$9,358,289,000	\$3,261,118,000	

Examinations in Progress 12/31/2017					
	US Direct Premium	MA Direct Premium	Surplus		
Property & Casualty Insurers					
Coface North America Insurance Company	103,764,000	2,447,000	46,110,000		
Electric Insurance Company	317,317,000	24,188,000	534,058,000		
Hospitality Mutual Insurance Company	11,323,000	11,323,000	26,111,000		
Health Insurers					
Dental Services of Massachusetts, Inc.	260,414,000	260,414,000	351,871,000		
DSM Insurance Company of MA	8,117,000	8,117,000	6,677,000		
Harvard Pilgrim Health Care, Inc.	1,755,057,000	1,544,996,000	456,802,000		
Harvard Pilgrim Health Care of New England, Inc.	460,132,000	460,132,000	60,086,000		
HPHC Insurance Company	753,810,000	394,998,000	70,610,000		
Life, Accident & Health Insurers					
Boston Mutual Life Insurance Company	169,661,000	38,610,000	177,994,000		
Centre Life Insurance Company	21,824,000	911,000	94,477,000		
Residual Market					
Massachusetts Capital Resource Company	0	0	0		
Self-Insured Groups					
Massachusetts Bay Self-Insurance Group	0	5,608,000	229,000		
TOTALS	\$3,861,419,000	\$2,751,744,000	\$1,825,025,000		

Other Insurance Entities

In addition to examining traditional insurance companies, the Section also conducts periodic examinations of domestic self-insured groups, residual market pools and over 140 fraternal benefit and mutual aid societies.

Special Brokers Tax Collection

The Financial Examination Section collects state taxes on the Excess and Surplus Lines business written by Special Brokers licensed in Massachusetts. Collections in calendar year 2017 for business written in calendar year 2016 totaled \$39 million on written premium of \$971 million.

Life Company Certification and Valuation Fees Collection

At the end of each calendar year, Division financial examiners are charged with compiling the actuarial valuations of insurance reserves of Massachusetts domiciled life insurance companies, as described in the annual financial statements and the actuarial reserve exhibits. These valuations are reviewed in context with the actuarial opinions provided by the companies, including required asset adequacy testing on these reserves. The Division then issues a certification of the company's entire reserve liability. Under Massachusetts law, the companies are required to pay fees for the annual valuation process and for the certificates issued. Valuation and certification fees billed in 2017 amounted to \$726,000.

3.4 Special Activities

Training & Professional Accomplishments

Financial Examination Section managers attended the Society of Financial Examiner's annual Career Development Seminar (CDS) in July 2017. The Society of Financial Examiners (SOFE) is a professional society made up of state insurance examiners throughout the United States and its territories. Through lectures, roundtable discussions and interactive formats, participants learn the latest developments, current and emerging issues, and new solutions in the regulation of insurance companies. Topics also include the risk-focused examination approach, fraud detection, IT development, and the latest legislation, auditing and regulatory issues.

4 - Market Conduct

4.1 Mission

The primary mission of the Market Conduct Section is to ensure the fair treatment of policyholders in the Massachusetts insurance marketplace. This is accomplished through a number of processes, primary of which is to conduct comprehensive and limited scope examinations and market analysis reviews of insurance companies.

The Market Conduct Section investigates the manner in which insurance companies treat policyholders in order to ensure that such treatment is fair, and in compliance with the terms and conditions of insurance contracts, and complies with state laws, regulations and bulletins. Comprehensive examinations involve interviews of key company personnel and review of company records and practices, including those relating to company operations, sales, advertising, rating, underwriting, claims decisions, and complaint handling.

Based upon the results of the examination, the Division issues a report which includes observations and recommendations, and when necessary, findings and required actions to correct company procedures which adversely affect insurance consumers or do not comply with law. Significant findings may result in further administrative action and may lead to fines, payments to consumers or other benefits to policyholders.

The Market Conduct Section also conducts Market Analysis Reviews of various regulatory data covering select companies doing business in Massachusetts. Review of this regulatory data enables the Section to better understand the current state of the marketplace and to identify possible areas of regulatory intervention.

The Market Conduct Section also uses information provided by, and shares information with, the NAIC, and actively participates in multi-state examinations.

4.2 2017 Goals

1. Monitor insurers and industry trends, and analyze their impact on consumers and the insurance marketplace to determine whether regulatory intervention or oversight is appropriate.

Complete 📂

2. Monitor the progress of multi-state regulatory settlement agreements in which the Division is a lead state negotiator.

Complete

3. Determine whether multi-state regulatory settlement agreements negotiated by other states are fair to Massachusetts consumers.

Complete

4. Maintain a market conduct examination program in accordance with NAIC and Division guidelines.

Complete



5. Conduct substantive market conduct examinations that are thoughtfully planned and timely executed by qualified and trained professionals.

Complete



4.3 Primary Activities

Examinations and Reviews

The market conduct examination process enables the Division to ensure that insurance companies treat policyholders and consumers fairly, and in accordance with both the terms of the insurance contract and state laws and regulations. Completed examinations can result in insurance companies taking corrective action to address identified violations to prevent their recurrence.

In 2017, the Market Conduct Section completed comprehensive examinations of 8 domestic and foreign companies, which evaluated the following business practices:

- Company operations and management;
- Timely and fair complaint handling;
- Marketing and sales practices;
- Appointment and licensing of producers;
- Underwriting and rating guidelines and practices; and
- Claim handling and settlement practices.

The Market Conduct Section completed comprehensive examinations of the following companies in 2017:

- 1. The Andover Companies (3)
- 2. Berkshire Life Insurance Company of America
- 3. Barnstable County Mutual (2)
- 4. Massachusetts Mutual Life Insurance Company
- 5. The Premier Insurance Company of Massachusetts

Market Analysis

In 2017, the Market Conduct Section completed 115 market analysis reviews on 110 companies for certain lines of business (homeowners, long term care, and life and annuity). During market analysis reviews, the Division assesses data from a variety of sources, including the Market Conduct Annual Statement; certain NAIC databases, including the Complaint Database, Regulatory Information Retrieval System; Examination Tracking System; and insurance company-submitted financial statements. Additionally, the Market Conduct Section reviews complaint files from the Division's Consumer Services Unit. These market analysis reviews provide an early warning mechanism used to identify company noncompliance with insurance laws and regulations and negative trends which may impact future claim payments.

Consumer Restitution

The Market Conduct Section's examination and multi-state regulatory settlement agreement with UNUM Group detailing UNUM's improper claim handling practices, including denials and terminations of payments on group and individual disability income policies, continued to provide restitution to disabled Massachusetts claimants. As of December 31, 2017, over \$16.4 million has been paid or reserved for payment to future claimants.

Monetary Fines

In 2017, the Market Conduct Section collected over \$1.3 million in fines as a result of several multi-state regulatory settlement agreements.

5- Producer Licensing

License Types

- Producers
- Advisers
- Auto Clubs & Auto Club Agents
- Bank Insurance Licenses
- Life Settlement Brokers
- Motor Vehicle Damage Appraisers
- Portable Electronics
 Limited Lines Licenses
- Public Insurance Adjusters
- Reinsurance Intermediaries (brokers & managers)
- Surplus Lines Brokers

The Producer Licensing Section licenses individuals and business entities to engage in the business of insurance in the Commonwealth, and ensures that all insurers who appoint licensed producers annually renew or nonrenew their appointments. The Section approves all business names (including DBA names), processes all name and address changes, as well as license terminations and voluntary licenses surrenders, and issues certification letters, clearance letters and duplicate or replacement licenses. The Section ensures that all resident individual producer licensees and all resident individual public insurance adjusters adhere to the continuing education requirements for each license type. In addition, the Section responds to written inquiries from multiple sources and monitors and responds to two electronic mailboxes--one for producer questions and updates and one for appointment renewal questions--and handles approximately 2,500 phone calls per month.

5.1 Mission

- Ensuring that individuals and business entities conducting the business of insurance in Massachusetts are qualified and in good standing, and that they conduct business within the requirements of the Commonwealth's laws and regulations.
- Timely and accurately processing all license applications.
- Timely and accurately respond to all licensing inquiries.
- Providing excellent customer service to our licensees.

5.2 2017 Goals

Complete
 Complete
 Complete
 Complete
 Complete
 Continue efforts to upgrade and enhance the Division's licensing systems for all individual and business entity license types.
 Coordinate the Division's annual license examination review workshop with

Complete

Prometric, the Division's exam vendor and host of its continuing education database. Invite subject matter experts from the Division and the insurance industry.

5.3 Primary Activities

Completion of CE Producer Renewal Online Licensing Project

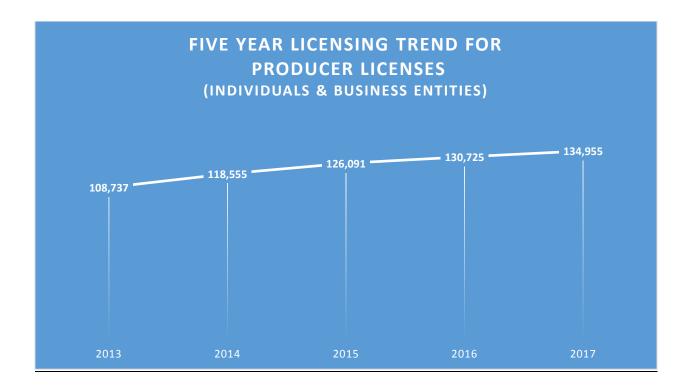
The Division continues to enforce the project begun in 2016 to align a producer's CE compliance date with their renewal date.

Prometric Exam Review Workshop

A number of Division staff and insurance industry personnel participated as subject matter experts at the annual Prometric Exam Review Workshop, where they reviewed examination questions and evaluated the overall quality of the exams. The workshop was a success, and new examinations were ready for use as of August 25, 2017.

The workshop also resulted in changes to the Candidate Licensing Handbook ("Handbook") for exams to be given after August 25, 2017. The Handbook is now available on both Prometric's and the Division's websites.

Licenses Issued and / or Renewed in 2015–2017 by Type			
License Type	2015	2016	2017
Insurance Producers	126,091	130,725	134,955
Motor Vehicle Damage Appraisers	4,936	4,992	5,034
Surplus Lines Brokers	2,553	2,689	2,796
Public Insurance Adjusters	323	322	319
Insurance Advisors	612	624	626
Life Settlement or Loan Brokers	62	82	105
Portable Electronics Limited Lines Licenses	35	37	16
Reinsurance Intermediaries	199	182	221
Auto Club Agents	486	544	824
Auto Clubs	28	27	27
Banks in the Business of Insurance	96	98	93



6 - State Rating Bureau

6.1 Mission

The State Rating Bureau's ("SRB") mission consists of three primary functions:

- Monitoring insurance markets;
- Developing technical reports and conducting analyses on emerging trends in support of the Division's regulatory responsibilities; and
- Reviewing policy forms, rules and rates filed by or on behalf of insurance companies, to ensure that insurance coverage and rating practices are actuarially sound, comply with all laws and regulations, and are fair to consumers.

The SRB participates, on behalf of the Commissioner, in numerous intra-governmental and public policy groups that evaluate policy options. It also works closely with the Division's legal staff to develop regulatory guidance that clarifies rating and policy requirements. The SRB communicates rate filing procedures to the insurance industry through filing guidance letters and checklists, and assists in the development of guides and alerts that explain features of various insurance products to consumers.

6.2 2017 Goals

 Continue to facilitate the implementation of the reformed private passenger auto insurance market, by establishing guidelines that promote the entrance of new insurers to the market, greater diversity of products, and rates that improve the availability of choices for Massachusetts' consumers.

Complete



 Strengthen quality of workers' compensation data reporting by amending the Workers' Compensation Statistical Plan, to specify agreed upon procedures which ensure the accuracy of injury type codes and the identification of reconciling items for earned premium and incurred loss variances. Complete



 Redesign disaster preparedness web page on Division website. Draft data collection spreadsheet and bulletins to achieve maximum efficiency in collecting data after a major disaster.

Complete

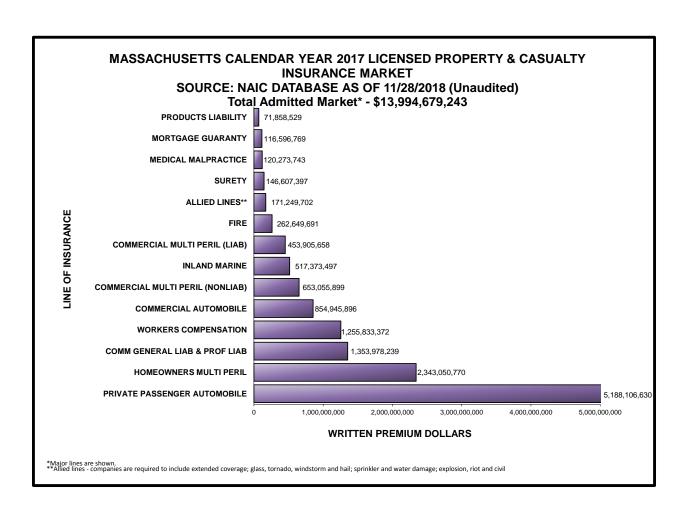


6.3 Primary Activities

As the technical advisor to the Commissioner, the SRB's work covers many different areas of the insurance marketplace. In 2017, the SRB performed reviews and analyses in the following lines of insurance:

- Private passenger automobile;
- Homeowners';
- Workers' Compensation;
- Medical Malpractice;
- Life; and
- Health.

The following chart illustrates premium for the Massachusetts property and casualty market.



6.31 Private Passenger Automobile

Private passenger automobile insurance accounted for approximately \$4.92 billion in Massachusetts written premium dollars in calendar year 2017, more than twice the total premium collected for any other line of property and casualty insurance.

The SRB is responsible for:

- Monitoring the activities of the residual market administered through Commonwealth Automobile Insurers ("CAR");
- Reviewing all company and CAR form, rule and rate filings; and
- Reviewing statistical plan filings.

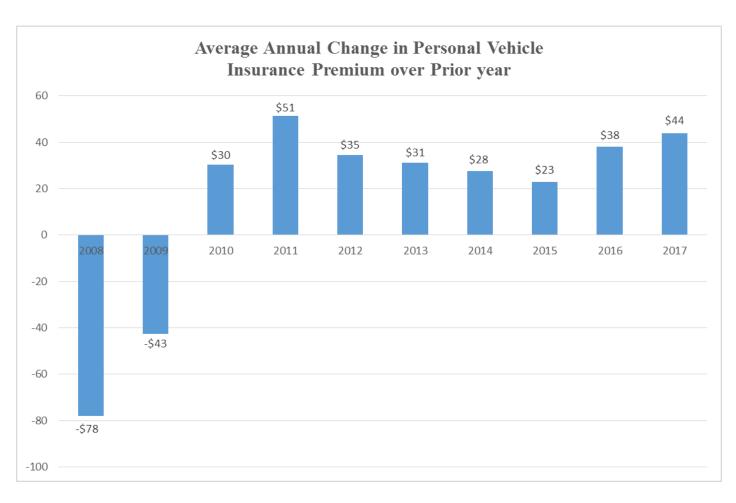
Transition to Competitive Rate Regulation

Since the move to managed competition in the private passenger automobile insurance market on April 1, 2008, 16 new insurance companies have started writing private passenger auto insurance in Massachusetts. Eleven of the 16 new companies market their products through independent agents.

The average annual personal automobile expenditure per vehicle has risen by 3.6% per year since 2010.

Automobile Insurers Entering MA Market Since April 1, 2008

- AIG Private Client
- Allstate
- Ameriprise
- Bankers Standard
- Esurance
- GEICO
- Green Mountain
- Harleysville
- Occidental
- Peerless
- Praetorian
- Preferred Mutual
- Progressive
- PURE
- Vermont Mutual
- Cincinnati

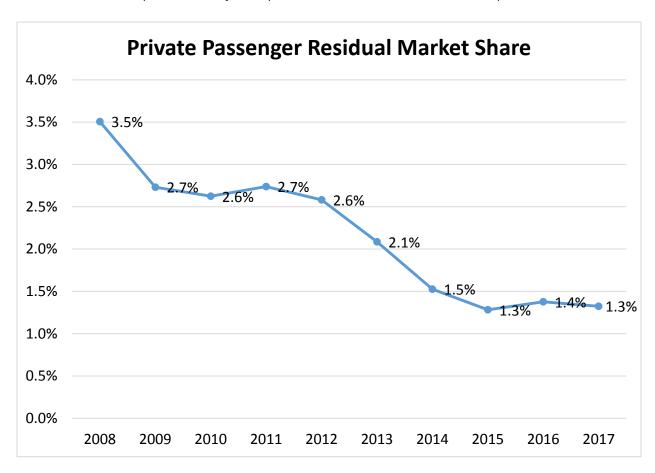


The 2017 estimated average personal automobile premium per vehicle is \$160 more than it was in 2007, prior to the introduction of competitive rate regulation.

Residual Market Reform

The final transition year to an assigned risk plan for the private passenger automobile residual market began on April 1, 2009. The residual market declined from 2.7% of the total market at year end 2009 to 1.3% by year end 2017.

Significant procedural changes were implemented at CAR to develop and maintain credits for insurance companies that voluntarily insure policies that would otherwise likely be insured through the MAIP. Actual changes in residual market share continued to drive the indicated and actual credits in the market, which is a more transparent and objective process than had been followed in the past.



6.32 Homeowners' Insurance

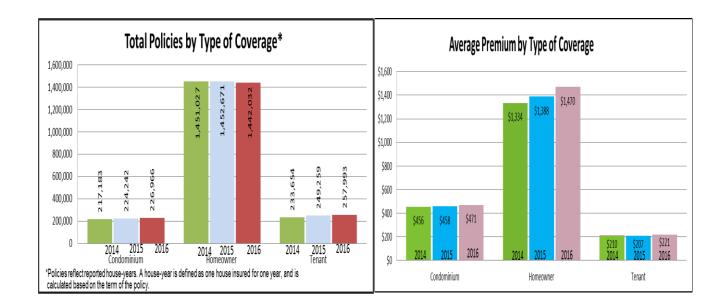
Homeowners' insurance covers the cost of damage to one's home, as well as personal liability claims that may be filed against the homeowner. The SRB is responsible for:

- Monitoring the market for coverage;
- Reviewing the activities of the residual market administered through the Massachusetts Property Insurance Underwriting Association (the "FAIR Plan"); and
- Reviewing all company and FAIR Plan form, rule and rate submissions. In 2017, SRB staff completed a report required by M.G.L. c. 175, §§ 4A and 4B, that examined the market for homeowners' insurance, the causes of homeowners' insurance losses, trends in policy cancellations and non-renewals, and emerging trends in the availability of coverage, especially in coastal areas. A copy of the report is available on the Division's website at www.mass.gov/doi.

The report found that the number of Massachusetts' homeowners' insurance policies written between 2014 and 2016 increased by approximately 25,128 policies.

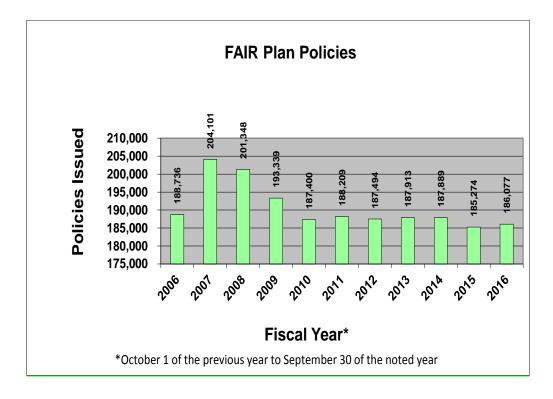
Between 2014 and 2016, the average premium for homeowners' policies increased from \$1,334 to \$1,470 per policy, and condominium policies increased from \$456 to \$471.

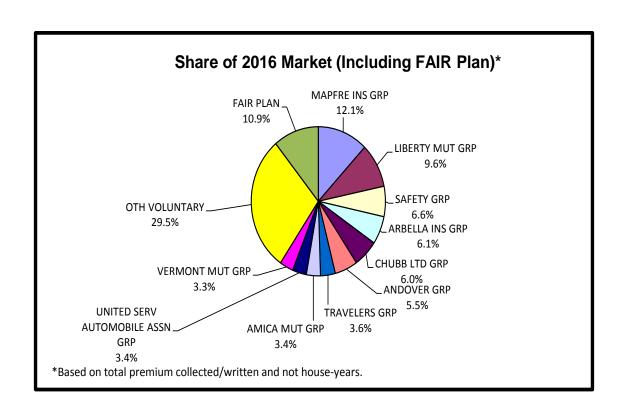
Commissioner's Report on Home Insurance



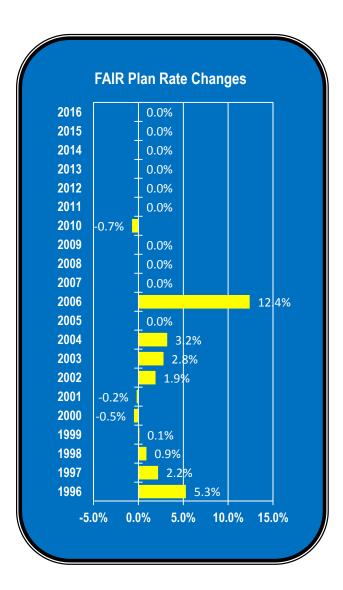
Availability of Coverage

In Massachusetts, the FAIR Plan provides homeowners' insurance coverage when a homeowner cannot obtain coverage directly from licensed homeowners' insurance companies. In 2005, the number of policies covered under the FAIR Plan began to increase, though the SRB believes that the FAIR Plan's overall market share has reached its plateau. By the end of 2016, the FAIR Plan had decreased from a high of 204,101 policies in 2007 to 186,077 in 2016. The Fair Plan now writes the second largest share of the homeowners' market (10.9%), though this is less than the 15.4% market share it wrote in 2008.





The following chart identifies the FAIR Plan rate changes since 1996, but there have been no rate changes since 2011.



Workers' Compensation

The State Rating Bureau is responsible for monitoring:

- Market-wide alterations in availability of coverage.
- The structure of the statistical plan documenting insurer loss and premium experience.
- The health and efficiency of the residual market pool.

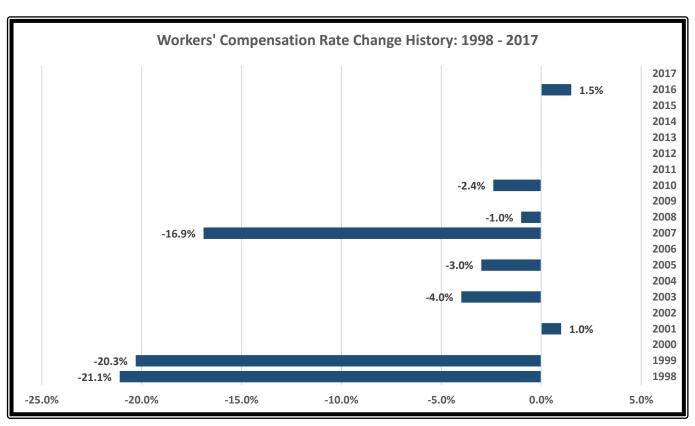
6.33 Workers' Compensation Insurance

Workers' compensation insurance covers lost wages and medical / rehabilitation costs associated with work-related accidents or illnesses. With few exceptions, employers are required to purchase workers' compensation coverage for their employees.

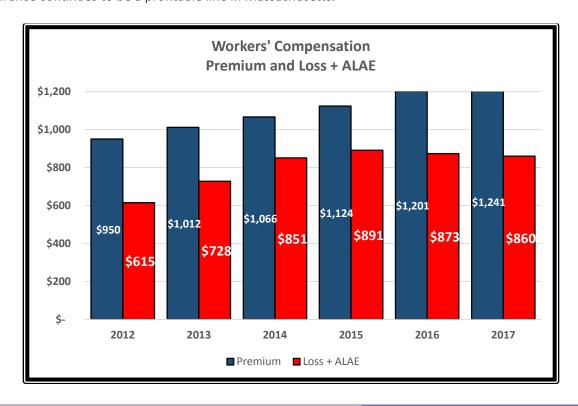
SRB staff reviews all rule, rate, form and rate deviation filings submitted by industry bureaus, individual companies and Self-Insurance Groups. The coverage levels and rates are determined according to the processes established under M.G.L. c. 152. Industry filings are coordinated through the Workers' Compensation Rating and Inspection Bureau of Massachusetts ("WCRIB"), an entity licensed as a Rating Organization under M.G.L. c. 174A. The WCRIB also acts as the Division's Statistical Agent and Pool Administrator.

Rate Review

Although no rate filing was submitted to change workers' compensation rates for 2017, the WCRIB filed for an 11.1% decrease in average rates for industrial classes in December 2017, with hearings scheduled to begin in early 2018.

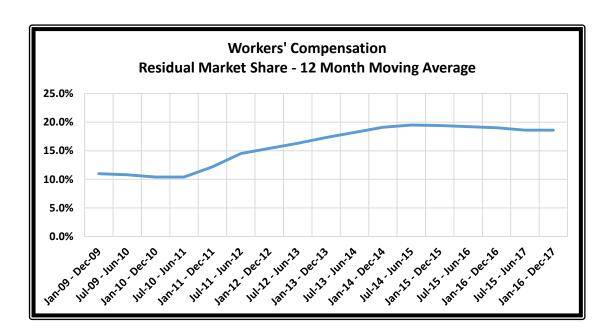


It is worth noting that the calendar year information displayed below suggests that, despite many rate reductions and downward company deviations over the last two decades, workers' compensation insurance continues to be a profitable line in Massachusetts.



Monitoring the Workers' Compensation Residual Market

Workers' compensation companies are permitted to decline risks, who can then obtain coverage through the Massachusetts Workers' Compensation Assigned Risk Pool. The Division monitors whether companies are increasing the number of risks covered through the pool.



6.34 Medical Malpractice Insurance

Medical malpractice insurance covers medical malpractice claims and the expenses associated with defending against alleged medical malpractice. The SRB is responsible for:

- Monitoring the market for coverage;
- Analyzing and collecting data;
- Reviewing the activities of the Residual Market Pool; and
- Reviewing all company-filed form, rule and rate filings.

In 2017, SRB staff completed the "Medical Malpractice Insurance in the Massachusetts Market 2016" report, which is available on Division's website at www.mass.gov/doi.

Annual Medical

Malpractice Report

2016 Findings

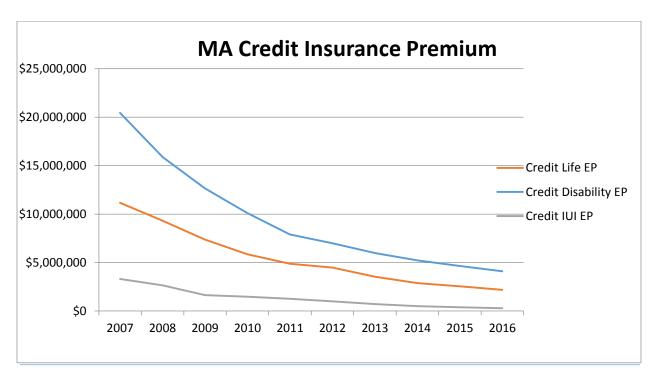
- Premium dollars written for medical malpractice coverage decreased from \$314.6M in 2010 to \$314.4M in 2016.
- 2. Proportion of coverage written in regulated market dropped from 54.6% in 2013 to 41.1% in 2016.
- 3. Proportion of coverage written in unregulated surplus lines and risk retention markets grew from 45.4% in 2010 to 58.9% in 2016.

6.35 Credit Insurance

Credit insurance is offered with many non-mortgage loans and credit card applications. Depending on the coverage, these products will pay all or some portion of outstanding loan balances in the event of the death, disability, or involuntary unemployment of the covered person. Insurance companies offering these policies must issue special disclosures to make the covered persons aware that they are not required to purchase the coverage to obtain the loan or credit. Insurers must also comply with special statutory loss ratio requirements.

The Division compiles an annual report on credit insurance based upon information submitted by the individual carriers. In the course of reviewing the data, the SRB determines whether companies continue to satisfy the minimum loss ratios required by statute for credit life (50%), credit accident and sickness (55%), and credit involuntary unemployment insurance (60%).

In general, the level of coverage issued in Massachusetts has continued to drop as other non-insurance debt relief products, including debt cancellation products, became available from banking institutions. Between 2007 and 2016, total reported credit insurance premium for Massachusetts fell by more than 80% from \$35 million to \$6.6 million.



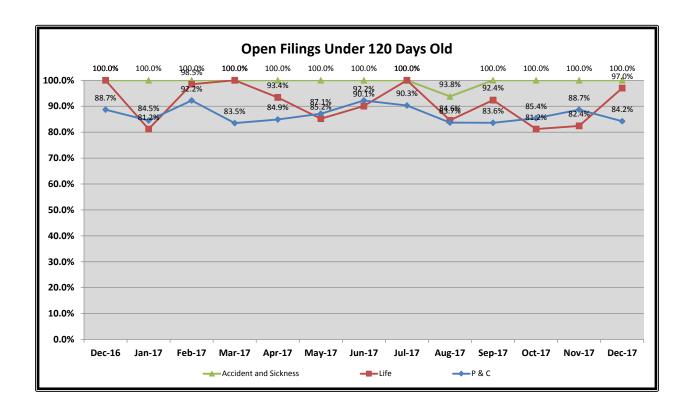
6.36 Life Insurance

The Division promulgated no new life insurance regulations nor issued any new life insurance bulletins during calendar year 2017.

7 - Policy Form Review

The Policy Form Review Section is responsible for reviewing insurance company property and casualty, life and annuity, and individual accident and sickness filings to ensure they are consistent with Massachusetts law. These reviews focus on consumer protection, adequate reserving for claims, and justification of rates.

The Policy Form Review Section works to manage and timely complete product reviews, so that it can redeploy resources to address delays and make policy forms available for companies to use in the market.



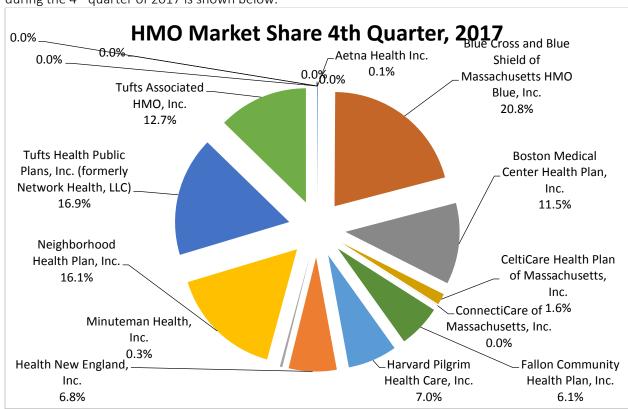
8 – Bureau of Managed Care

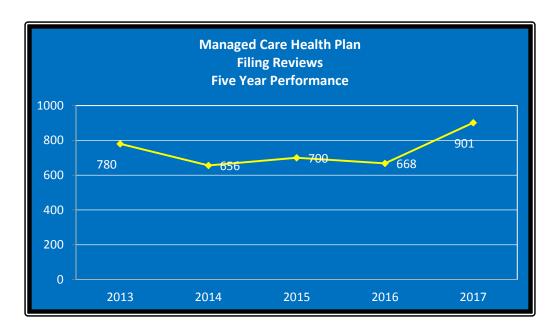
The Bureau of Managed Care ("BMC") reviews health insurance company materials to determine whether their operations satisfy managed care protections required under M.G.L. c. 1760. These protections include those related to:

- Consumer disclosures;
- Evidences of coverage;
- Provider contracts;
- Network directories;
- Utilization reviews;
- Quality assurance and credentialing; and
- Internal appeals systems.

In addition, the BMC advises the Commissioner on emerging issues associated with health reform, health insurance company operations and administrative practices, managed care practices, and mandated health benefits.

Health maintenance organizations ("HMO") provide the vast majority of all insured health plan coverage in Massachusetts. More than 2 million people receive health care coverage through an HMO plan provided by one of 12 companies. Relative market share during the 4th quarter of 2017 is shown below.





Managed Care Accreditation Reviews

The BMC is responsible for conducting a comprehensive review every two years of all insured health plans with managed care systems to determine their compliance with the requirements of M.G.L. c. 1760. Companies that are not accredited are not permitted to offer a managed care plan in Massachusetts. In 2017, the BMC completed the review of 901 filings that were new or were submissions of material changes to previously submitted fillings.

Federal Grant Initiatives

As was noted in the most recent past report, CMS approved a grant for the Division to Plan and Implement Insurance Market Reforms under Part A of Title XXVII of the Public Health Service Act, Cycle I. With these funds, the Division can review carriers' preventive care benefits, Medical Loss Ratio rebate filings and mental health parity compliance for the period between October 31, 2016 and October 30, 2018.

Study of Provider Networks

In the first project funded under the grant, the DOI commissioned a study of provider directory information made available by carriers in order to ensure the accuracy of information that they share with insureds. During 2017, the Division worked on two phases of the project with consultants. For phase 1, consultants completed "secret shopper" phone calls to providers in order to determine the accuracy of information contained in carriers' provider directories, with a heavy focus on information related to behavioral health provider information. For phase 2, consultants reviewed the administrative and information processes used by carriers to collect, store and monitor provider information. Division staff continue to work with the consultants on both phases of the project.

Preventive Services

As part of the Division's review and enforcement of Section 2713 of the Public Health Services Act, the Division looked during 2017 to examine carriers within the market for compliance with Federal and State requirements related to the coverage of certain preventive health services, including evidence-based screenings and counseling, routine immunizations, preventive services for children and youth, and preventive services for women. The Division, during 2017, put out a Request for Response, and subsequently hired a consultant to review carriers' compliance related to cost-sharing information for these preventive services.

Medical Loss Ratio

The Division commissioned a study during 2017 to review compliance of a carrier's submission of Medical Loss Ratio information as required under Section 2718 of the Public Health Services Act. During 2017, the Division issued a Request for Response and subsequently hired a consultant to perform the review.

Chapter 224 Implementation

The Division continues to gather input from various constituents on uniform summary of payments, health plan eligibility, and miscellaneous other issues.

Staff received materials from the Mass Collaborative, a partnership of carriers and providers that developed standard utilization forms to be used by carriers and providers when requesting authorization for specialty prescription drugs. Division staff worked with the Mass Collaborative to agree on standard prior authorization forms for a number of services, including Hepatitis C Medication and Non-OB Ultrasound and SYNAGIS.

9 - Health Care Access Bureau

The Health Care Access Bureau ("HCAB") is responsible for monitoring the market for health insurance, concentrating on the availability and affordability of coverage. Members of the HCAB work with many other state agencies, including the Health Policy Commission, Group Insurance Commission, Center for Health Information and Analysis, Executive Office of Health and Human Services, Department of Public Health, Department of Mental Health, the Attorney General's Office and the Commonwealth Health Insurance Connector Authority, to ensure that regulations and bulletins follow consistent approaches across state agencies. The HCAB also coordinates closely with the Center for Medicare & Medicaid Services ("CMS") on all matters related to the Affordable Care Act.

Mental Health Parity

During 2017, the Division continued to collect annual filings from carriers to verify compliance with federal and state mental health parity laws. The Division published an aggregate report showing carrier responses, which included 2016 data on behavioral health and medical requests for prior authorization of services.

Chapter 224 Implementation

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Small Group Rate Review

During calendar year 2017, the Division reviewed the Massachusetts small group filings that carriers submitted for 2nd quarter, 3rd quarter and 4th quarter 2017 rates, as well as the rates to be effective for the 1st quarter of 2018 and rate filings for dental insurance. All rate filings were reviewed for completeness and accuracy by the Division's internal actuary and five external consulting actuaries, according to the filing standards identified in 211 CMR 66.00. The reviews focused on verifying that the filings triggered none of the presumptive disapproval standards for medical loss ratios, administrative expenses, or contribution-to-surplus; and examined the reasonableness of the rates in relation to the benefits provided in the filing. The final approved statewide average rate changes are set forth in the table below:

Quarter	Statewide Average Rate change
2Q '17	+9.5%
3Q '17	+7.5%
4Q '17	+8.4%
1Q '18	+16.8%*

To assist with the improvement of the rate review process, the HCAB continued several research projects conducted by external consultants as part of a federal grant program, including studies of risk adjustment, prescription drugs, behavioral health and provider risk sharing, as relevant to health care costs – and thus health insurance rate increases. The HCAB also used federal grant money to contract with consultants to audit each of the merged market carriers, to assess whether premiums were being calculated in accordance with approved rates.

Administrative Simplification

In 2017, HCAB staff continued to work with the Center for Health Information and Analysis ("CHIA") toward the goal of sourcing health insurance data from CHIA's All Payers Claim Database ("APCD") instead of from insurer-generated data calls and reports. Federal grant funding will be used to formalize the rest of this joint long term project. The focus in 2017 was to finalize the process of transitioning membership reports to the APCD, and to begin reviewing the process of transitioning utilization and claims reporting to the APCD. Once the HCAB is satisfied that the APCD data is sufficiently accurate for its reporting purposes, it is hoped that other state agencies will follow suit and use the APCD data for their information needs, with the goal of reducing rates by decreasing the volume of carriers' data reporting and the resulting reduction in associated holders, to develop solutions and thus ensure continuation of a stable market.

Substance Use Disorder Treatment Initiatives

HCAB staff was responsible for implementing several initiatives related to the Administration's efforts to address the opioid crisis. HCAB staff participated on the Drug Formulary Commission, which was created to address the use of abuse-deterrent drugs as an alternative to existing opioids that do not have abuse-deterrent features. The DOI issued Bulletin 2017-08, which gives guidance to health insurance carriers with regard to coverage for abuse deterrent drug product

10 - Office of General Counsel

10.1 Mission

The Office of General Counsel ("OGC") assists the Commissioner in administering the Commonwealth's insurance consumer protection laws through the regulation of the insurance industry. The OGC further assists the Commissioner in monitoring insurance company solvency by coordinating the rehabilitation of financially troubled insurers, and the takeover and liquidation of insolvent insurers.

10.2 2017 Accomplishments

- Provided legal support and advice to the Commissioner, Division staff, consumers, Executive and Legislative branch members, and other interested parties in the Massachusetts insurance marketplace.
- Reviewed and analyzed proposed or enacted legislation affecting insurance companies and the insurance-buying public.
- Researched and drafted regulations, regulatory bulletins, and interpretative letters on Massachusetts insurance laws and regulations.
- Served as hearing officers in various regulatory proceedings, including hearings concerning new or amended regulations; and financial transactions including proposed mergers and acquisitions, and transfers of domicile.
- Provided a flexible alternative to litigation through the adjudicatory hearing and administrative appeal processes
 conducted by the Hearings and Appeals Section. Adjudicatory hearings include insurance rate proceedings and
 enforcement actions against Division licensees, and administrative appeals include appeals from decisions of the
 residual market entities overseen by the Commissioner.
- Continued to implement Executive Order No. 562 To Reduce Unnecessary Regulatory Burden. In this regard, the OGC reviewed and recommended changes to Division regulations in order to increase administrative simplification and reduce unnecessary regulatory burdens.

10.3 Primary Activities

10.31 Hearings and Appeals

Massachusetts law requires the Division to conduct hearings on a variety of matters. The Hearings and Appeals Unit consists of two hearing officers and a docket clerk, who manage all aspects of the hearing process from initial docketing to final decision. In any year, the case load may include:

- Insurance rates for workers' compensation insurance coverage;
- Insurance rates for property insured through the Massachusetts Property Insurance Underwriting Association (the "FAIR Plan");
- Proposed new regulations or amendments to current regulations;
- Disciplinary actions initiated by the Division against licensees;
- Appeals from Division decisions denying license applications;
- Matters relating to the residual market for automobile insurance managed by Commonwealth Automobile Reinsurers ("CAR"), including CAR's Rules of Operation and appeals from decisions of CAR's Governing Committee;
- Appeals from employers about their workers' compensation insurance premiums;
- Appeals from FAIR Plan decisions denying insurance coverage;
- Insurance company mergers or acquisitions; and
- The state of the market for Medicare supplement insurance.

In addition, a Hearings and Appeals staff attorney is the Commissioner's designee to serve as chair of the Board of the Review in the Division of Insurance. That Board is authorized to hear disputes between medical service corporations and providers of health care services (M.G.L. c. 176A, §12), dental service corporations and participating dentists (M.G.L. c. 176E, §12), and optometric service corporations and participating optometrists (M.G.L. c. 176F, §12).

2017 Hearings and Appeals Highlights

The Workers' Compensation Rating and Inspection Bureau of Massachusetts initiated an industry-wide rate proceeding in December 2017. The public hearing on the filing took place on January 29, 2018; the parties settled the matter and a decision approving the stipulation was issued in March 2018.

On December 19, 2017, the FAIR Plan filed for a Named Storm Deductible to be attached as an endorsement to its Homeowners Multi-peril and Dwelling Fire and Extended Coverage policies. A public hearing on the filing was held on February 23, 2018. The parties submitted a stipulation that was approved in a decision issued on May 11, 2018.

Two financial matters were docketed and heard in 2017. Brighthouse Financial, Inc. and Brighthouse Holdings, LLC filed an application seeking approval to acquire control of the New England Life Insurance Company. After a public hearing, a decision approving the proposed acquisition was issued on June 22, 2017. General Electric Company, G.E. Capital U.S. Holdings, Inc., and G.E. Capital Global Holdings, LLC, filed an application seeking approval to acquire control of Electric Insurance Company. A hearing on the application was held on December 18, 2017, and a decision approving the transaction was issued on January 17, 2018.

Hearings and Appeals staff conducted hearings in 2017 on proposals to promulgate, amend or repeal 14 Division regulations. Final versions of ten of those regulations have been filed with the Regulations Division. Four remained under review at the end of 2017.

The Division initiated nineteen enforcement cases in 2017. Decisions issued in seven of those actions resulted in license revocations; fines were imposed in six. Two cases were settled, one was dismissed, and nine remained open. Ten enforcement cases filed in 2016 were decided in 2017. In all ten, the producer's license was revoked and a fine was imposed.

CAR submitted proposed changes to Rule 31 of the Massachusetts Automobile Insurance Plan Rules of Operation. On March 24, 2017, a decision was issued disapproving the proposed changes and scheduling an informational hearing.

Other matters handled by Hearings and Appeals included the annual hearing on the Massachusetts market for Medicare supplement insurance. Two employer appeals of their workers' compensation insurance rates were also docketed.

The Board of Review was convened to hear a petition filed on January 20, 2017 by the Massachusetts Dental Society objecting to actions of Dental Service of Massachusetts, Inc., a dental service corporation. A petition to the Board submitted by a group of dentists in 2014 was dismissed on multiple grounds on October 23, 2017, including failure to file the petition within the time frame prescribed by M.G.L. c. 176E, §12.

10.32 Litigation

The Board of Review's October 23, 2017 dismissal of a petition submitted by a group of dentists pursuant to M.G.L. c. 176E was appealed and the matter is now under review in the Superior Court for Suffolk County.

In January 2017, an insurer sought a judicial declaration relative to the application of M.G.L. c. 175, § 108(2)(a) to certain of its long-term care insurance rate increase filings. In September 2017, the Superior Court entered judgment in favor of the Division, concluding that the insurer's requested rate increases were not deemed approved, and because the rate increase filings were specifically disapproved by the Division, the rate increases could not be implemented by the insurer. The Superior Court determined that the Division's sub-regulatory guidance about M.G.L. c. 175, § 108(2)(a) was valid and not in conflict with the statute. The insurer has provided notice of an appeal of the Superior Court's decision.

10.33 Receiverships

If a Massachusetts domestic insurer's financial condition becomes impaired, the Commissioner is empowered by statute to seek a judicial order for appointment as receiver of the subject insurer. As receiver of a domestic insurer, the Commissioner has the responsibility to act as a fiduciary on behalf of policyholders and creditors to provide the greatest possibility that, at the conclusion of the matter, an insurer's obligations to policyholders will be met at or near 100%. This arguably extreme measure is designed for the benefit of all creditors, but the protection of policyholders is the primary concern.

Receiverships may involve plans to rehabilitate, run-off, or liquidate a company. If the Commissioner determines that an insurer lacks sufficient assets to meet all of its obligations to policyholders in the ordinary course of business, such insolvent insurer will then be liquidated. As liquidator, the Commissioner marshalls the insolvent insurer's assets, liquidates the assets, adjudicates claims, and makes distributions to the company's approved creditors.

If a foreign insurer doing business in Massachusetts becomes financially impaired, the Commissioner may seek judicial appointment as Ancillary Receiver, for the purpose of conserving the impaired foreign insurance company's assets in the Commonwealth for the benefit of its Massachusetts' policyholders and creditors.

	Domestic and Ancillary Receiversh	nips				
Active Domestic Receiverships						
Date Commenced	Company		Status			
	American Mutual Liability Insura	American Mutual Liability Insurance				
03/09/1989	Company and American Mutual I	Company and American Mutual Insurance				
	Company of Boston	Company of Boston				
11/01/2000	Lumber Mutual Insurance Compa	anies	In Rehabilitation			
06/09/1994	Monarch Life Insurance Compan	Monarch Life Insurance Company				
05/12/2009	Eastern Casualty Insurance Comp	Eastern Casualty Insurance Company				
08/02/2017	Minuteman Health, Inc.		In Rehabilitation			
Closed Domestic Receiverships						
08/26/1992	Attlebore Mutual Liquidating Tru	Attleboro Mutual Liquidating Trust				
08/20/1992	Attiebolo Mutual Elquidating Tru					
02/10/2000	Trust Insurance Company and Trust		Proceeding			
	Assurance Company		Terminated			
Active Ancillary Receiverships						
			Estimated Assets			
Date Commenced	Company	State	(market value as			
			of 12/31/17)			
10/03/2001	Reliance Insurance Company	Reliance Insurance Company PA				
06/06/2005 Home Insurance Company NH		\$2,604,042				
Closed Ancillary Receiverships						
None in 2017						

Distributions to Creditors

No distributions to creditors were made in 2017.

10.4 Other Activities

Public Record Requests

The OGC provides the Division's Records Access Officer, who in 2017 supervised and assisted in responding to more than 425 public records requests, and ensured agency compliance with the public record's law new data collection requirements. The OGC provided education and training to all Division employees on the newly amended public records law, and continues to provide such training to all new employees and interns at the start of their Division employment.

Section 1033 Committee Reviews

In 2017, Division attorneys and other Division staff continued to serve as the Commissioner's appointees to an advisory committee that reviews all applications for written consent to engage or participate in the business of insurance in Massachusetts under the provisions of the Federal Violent Crime Control and Law Enforcement Act of 1994, 18 U.S.C. § 1033 ("§ 1033 Committee") The advisory committee makes recommendations to the Commissioner on the disposition of such applications. In 2017, the § 1033 Committee responded to a number of inquiries and received one completed application for written consent to engage in the business of insurance, which the Commissioner granted at the recommendation of the Committee.

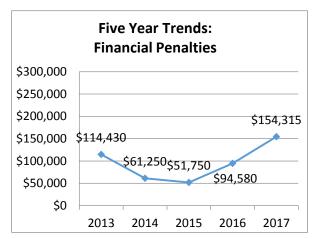
11 - Special Investigations

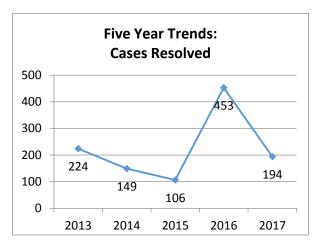
The Special Investigations Unit ("SIU") investigates allegations of misconduct by licensees and certain non-licensees, and recommends enforcement action where appropriate. These investigations involve finding, reviewing, and documenting evidence supporting allegations of unfair methods of competition, unfair or deceptive acts or practices in the business of insurance, and other violations of insurance laws and regulations. Division enforcement attorneys pursue appropriate enforcement action by applying relevant law to the facts and evidence developed by the SIU during the investigation. Enforcement case results are reported on the Division's website and to the Regulatory Information Retrieval System database ("RIRS") of the NAIC, which is accessible by insurance regulators in other jurisdictions.

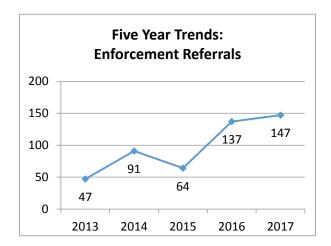
2017 Accomplishments

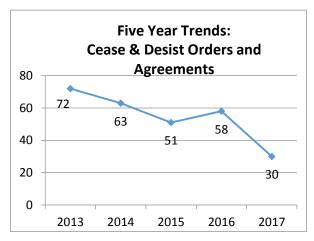
- 1. The SIU and enforcement sections closed a total of 194 cases in calendar year 2017. Common allegations investigated in this group of cases include:
 - 1. Licensees failing to make appropriate disclosures on license applications;
 - 2. Licensees failing to timely disclose administrative or criminal matters to the Division; and
 - 3. Licensee misrepresentation on insurance policy applications.
- 2. Results among the 47 enforcement cases resolved in 2017 include the revocation of 31 individual producer licenses. Additionally, there were 13 settlement agreements to cease and desist from improper conduct and/or from transacting insurance business in Massachusetts. There were an additional 17 cease and desist orders issued by a Hearing Officer.
- 1. Opened 165 new investigations and referred 147 cases from the SIU to Enforcement.
- 2. Obtained restitution for consumers in the amount of \$6,000 and assessed financial penalties in the amount of \$154,315.
- 3. Worked with insurance producers to reinstate their individual licenses upon completion of the continuing education required by M.G.L. 175, § 177E. In 2017, 403 producers entered into settlement agreements with the Division that allowed their licenses to be reinstated.
- 4. Scanned approximately 167 closed cases in its on-going attempts to digitize its closed inventory.

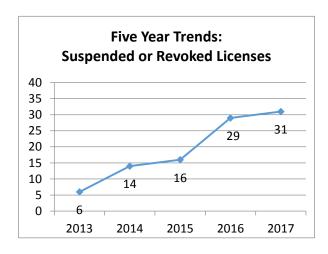
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12- Board of Appeal

The Board of Appeal (the "Board") was created by M.G.L. c. 26 § 8A, and conducts hearings for consumers who are appealing:

- The determination by an insurer that the insured was primarily at fault for a motor vehicle accident;
- A decision of the Registry of Motor Vehicles ("RMV"); and
- An insurance cancellation issued to a consumer by his or her insurance company.

Hearings before the Board of Appeal are conducted in accordance with M.G.L. c. 30A, although the Board has also promulgated its own Practice and Procedure regulations for accident surcharge appeals – 211 C.M.R. 88.00

Primary Activities

On average, the Board's hearing officers annually hear approximately 30,000 - 40,000 appeals of at-fault accident determinations, and 2,500 - 4,000 appeals of RMV actions. In 2017, the Board received 30,745 new appeals, with 30,240 live hearings scheduled. The Board also responds to consumer inquiries, researches legal issues, proposes new legislation, and works with the Office of the Attorney General to defend the Board's decisions in Superior Court.

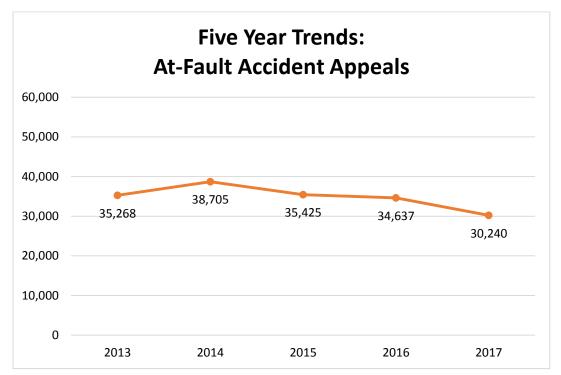
Hearings on At-fault Accident Determinations

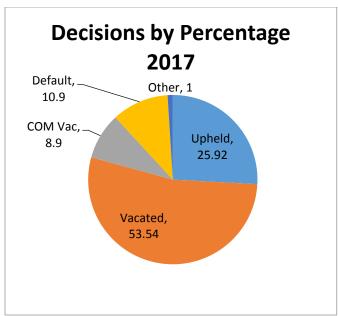
Each automobile insurance carrier administers a unique system of adjusting premium based on an operator's driving record. These merit rating plans typically decrease premium following years of incident-free driving, and increase premium for operators with at-fault accidents or traffic citations. These premium adjustments create a financial incentive that encourages safer driving.

A driver who feels he or she is not at fault for an accident may elect to have a hearing in order to contest that fault determination. These hearings only look at whether a driver is more than 50% at fault for the accident, a process which ensures that each company's merit rating plan is being run fairly and equitably.

At the hearing, the appellant and the insurer have the right to present relevant facts and circumstances by oral testimony and / or by documentary evidence, as well as to present witnesses and question any testimony offered by the other party. The appellant may elect not to appear at a hearing, and instead may submit a statement, along with any relevant documents, to the Board for an administrative review.

The Board vacates the insurer's at-fault determination if it finds that such determination was not in accordance with the Standards of Fault promulgated by the Commissioner pursuant to 211 CMR 74.00. The insurer must then refund to the appellant any additional collected premium that was specifically related to the vacated at-fault determination. The Board upholds the insurer's determination of fault if it finds such determination to be in accordance with the Standards of Fault. The Board conducted 30,240 hearings on appeals of at-fault accident determinations in 2017.





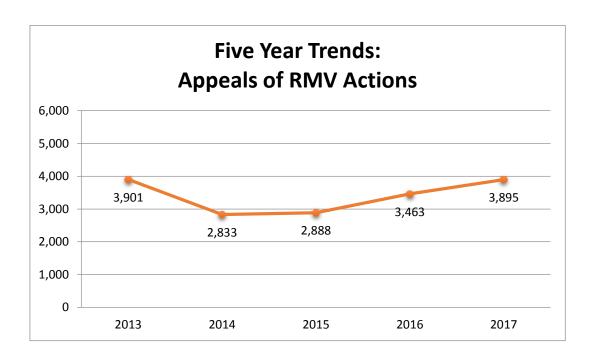
Hearing Locations

In 2017, the Board held hearings at twelve satellite locations across the Commonwealth, in addition to its primary office in Boston, so to provide greater convenience to consumers who need to schedule an appeal hearing. In 2017, the satellite locations included Marlboro, Springfield, Worcester, Leominster, Peabody, Somerville, Waltham, Dedham, Plymouth, Somerset, and South Yarmouth. The Board's Brockton satellite location was closed in 2017.

At-Fault Hearings By Location		
BOSTON	3,542	
BROCKTON	1	
DEDHAM	3,020	
LEOMINSTER	2,308	
MARLBORO	1,125	
PEABODY	3,766	
PLYMOUTH	1,742	
SOMERVILLE	4,271	
SOMERSET	1,760	
SPRINGFIELD	3,240	
SOUTH YARMOUTH	144	
WALTHAM	2,362	
WORCESTER	3,046	
Total	30,240	

RMV Appeal Hearings

The Board is given broad discretion through M.G.L. c. 90 § 28 to entertain appeals of any RMV decision. The majority of the appeals of RMV decisions the Board hears involve driver's license suspensions, inspection station suspensions, school bus operator 7D certificates and ignition interlock violations. The Board reviews applicable law, sworn testimony and relevant documentation from both the RMV representative and the appellant. After the hearing, the Board decides whether to affirm the RMV's decision or ruling, or whether to modify their decision. If the decision allows a license privilege to be fully or partially reinstated, the appellant must take the decision to the RMV to complete the required administrative procedures. A favorable decision is not equivalent to an operator's license being reinstated, but instead authorizes the appellant to go the RMV to finalize reinstatement with or without restriction. The Board does not review license suspensions arising from a chemical test refusal, or statutory revocations pursuant to a court order. In 2017, the Board received 3,895 RMV appeal requests, and conducted and issued decisions on 3,714 hearings on appeals from RMV decisions.



Breakdown of Types of RMV Appeals Heard and Decided by the Board in 2017

Interlock Violations	43	
Interlock Device		
Operating Under the Influence		
4 yr. loss Habitual Traffic Offender		
Immediate Threat		
Drug Charge	55	
30 day suspension (Handicap Placard Misuse)	5	
30 day suspension (3 Speeding Tickets)		
45 day suspension (5 Surchargeable Events)	0	
60 day suspension (Driving to Endanger / Reckless Driving)		
60 day suspension (7 Surchargeable Events)	116	
Loss of Commercial Driver's License ("CDL")		
Complaint Fraudulent License		
Operating After Suspension		
Inspection Sticker		

Inspector	7
Dealer/Repair/Farm	1
Handicap Placard Refusal	25
Fatal Accident Preliminary	16
Vehicular Homicide	43
Leaving the Scene (Property damage)	20
Leaving the Scene (Personal injury)	21
Medical Problem	114
Student Transport 7D License	12
Junior Operator's License ("JOL") Speeding	161
No Insurance	7
Tinted Windows	0

Total: 3,714 (including 519 OTHER violations)

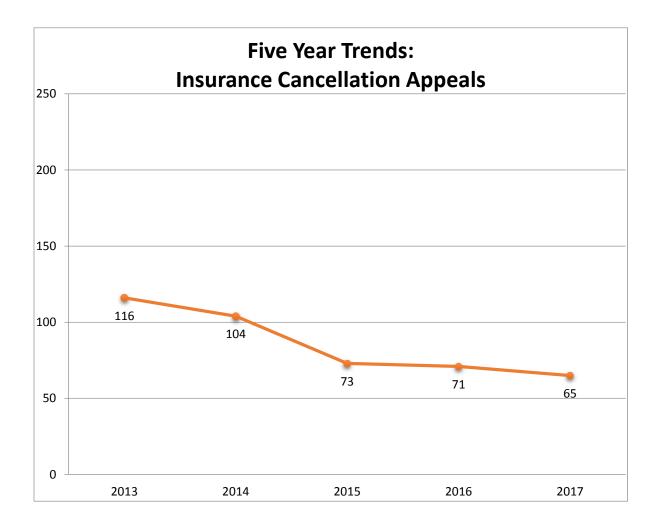
The total number of RMV decisions rendered in 2017 varies from the total number of RMV appeal requests received in 2017 because certain appeal requests received in 2016 were decided in 2017, or appeal requests received in 2017 were not decided in 2017.

Automobile Insurance Cancellation

The Board also hears appeals arising from automobile insurance cancellations. If a cancellation is at issue, the appeal must be filed with the Board before the cancellation date. If the appeal is timely filed, the policy will remain in effect until the Board has issued its decision. If an appeal is filed after the cancellation date, but within 10 days of cancellation, the Board will hear the appeal but the cancellation will take effect. The Board heard 65 insurance cancellation appeals in 2017.

An appeal may not be filed:

- 1) If a policy has been secured from another insurance company;
- 2) For non-payment of premium on a registered taxicab or fleet of taxicabs;
- 3) On a cancellation of a policy effected by a finance company; or
- 4) If a company refuses to renew a policy after the expiration of said policy.



13 - Automobile Damage Appraiser Licensing Board

Pursuant to M.G.L. c. 26, § 8G, there is within the Division the Automobile Damage Appraiser Licensing Board ("ADALB" or "Board"). The ADALB is responsible for regulating motor vehicle damage appraisers in Massachusetts. Four of the five ADALB members are appointed by the Governor, two of whom shall be affiliated with the auto body repair industry, and two of whom shall be affiliated with insurance companies writing casualty insurance in the Commonwealth. The fifth member, who is not affiliated with the auto body or insurance industries, is appointed by the Commissioner of Insurance and serves as the ADALB's chairperson. The ADALB institutes and enforces standards for the conduct of motor vehicle damage appraisers. It conducts licensing examinations, processes applications and issues and renews licenses. The Board can suspend, cancel, and revoke damage appraiser licenses, following a hearing process which originates from complaints filed with the ADALB. The Board may also decline to renew licenses when allegations of misconduct are brought against licensees. The ADALB sets licensing eligibility requirements, approves training programs, administers the practical portion of the license examination (Part-II), and establishes license revocation guidelines. It also holds frequent public meetings throughout the year.

In 2017, the ADALB issued 191 new licenses and approved 4,819 license renewals. There were a total of 29 complaints filed with the Board, and no licenses were suspended, revoked, or cancelled. It held five license exams in 2017, which were taken by 254 applicants.

14- Consumer Services

Mission

The Consumer Services Unit ("CSU") responds to inquiries, and assists consumers in resolving insurance complaints or disputes against insurers, producers and other licensees. The Unit works to ensure that licensees treat consumers fairly and consistently, and assists them in resolving issues related to claims, billing, benefits, underwriting and misrepresentation of policies, premium refunds and cancellation concerns. The Unit protects policyholders by empowering and educating them about insurance coverages, laws, and regulations, through available Consumer Alerts and publications. When appropriate, the Unit offers referral services to other organizations and regulatory agencies, including the Massachusetts Health Connector, the MA Office of Patient Protection and the US Department of Labor.

2017 Goals

Complete	1)	Investigate the majority of complaints within 8 months of receipt.
Complete	2)	Timely provide a customized and comprehensive response to all consumer inquiries.
Complete	3)	Respond to formal complaints with a customized letter detailing findings and, whenever applicable, assist consumers in receiving justifiable recoveries such as claim payments and premium refunds.
Complete	4)	Monitor reported consumer complaints for issue trends or patterns of improper business practices. Collaborate with Market Conduct and Special Investigation Units on notable concerns.

2017 Accomplishments

- 1. CSU staff handled approximately 100 formal written information requests, the majority of which related to insurance cancellations, continuation of coverage, company contact information, denied claims, claim settlement delays, and premium rates and increases.
- 2. Insurance examiners received 1,676 new formal complaints, and investigated and closed 2,123 cases.
- 3. CSU resolved most complaint investigations within an average of 240 days following receipt of the full complaint file, and recovered \$1,285,553 for Massachusetts consumers.

Primary Activities

Consumer Hotline

Insurance consumers can receive personal assistance from the CSU by calling the Consumer hotline Monday through Friday, 8:45 am to 5:00 pm. CSU responds to consumer issues in real-time and has the capacity to address matters received via its toll-free telephone hotline, general e-mail address, postal mail, and fax.

• CSU staff provided personalized assistance to consumers and responded to approximately 10,000 hotline calls in 2017.

Complaint Investigations: Protecting Policyholders

When a consumer files a formal complaint with the CSU, an insurance examiner is assigned to the matter. The examiner then contacts the licensee named in the complaint to gather and review information, to investigate the allegations and to work with the consumer and licensee toward a resolution. Complaints are investigated in accordance with applicable insurance laws, regulations, and contract provisions.

Complaints address consumer protection issues, such as delays in claim payment, concerns about increasing premiums, and cancellation of coverage. CSU closely monitors and tracks complaints in order to detect possible systemic concerns. Consistently, the top three most common types of insurance coverage for which the CSU receives complaints are auto, home, and health insurance. Some formal complaint investigations may

have findings that the concern was unjustified; namely, when there is no apparent violation of a policy or contract provision, rule or statute, or there is no valid concern that a prudent layperson would regard as a practice or service that is below customary business practice.

Complaint resolution may result in recovered monies or realized coverage for consumers. The Division receives an average of 140 formal written complaints each month. Below are the 5 top reasons for complaints, as well as the top 5 companies complained against in 2017:

Top 5 Reasons for Complaints in 2017 – All Complaints

- Denial of Claim
- Unsatisfactory Settlement/Offer
- Adjuster Handling
- Claim Delay
- Premium & Rating

Top 5 Companies Complained Against in 2017– All Complaints

- Commerce Insurance Company
- Blue Cross and Blue Shield of Massachusetts, Inc.
- Liberty Mutual Insurance Company
- GEICO
- Arbella Mutual Insurance Company

Online Consumer Publications

As part of its mission to provide insurance consumers with accurate and useful information, the Division produced a variety of consumer advisories and informational blogs in 2017. These materials deliver information on relatively complicated insurance topics in a manner that is readily accessible and easily understood by consumers.

Consumer alerts include:

- Information about Open Enrollment
- Glossary of Health Insurance terms
- Summer fun insurance tips
- Insurance information for disasters and winter weather
- Common misconceptions about insurance
- Travel Insurance tip

15 – Administration

The Administration Unit is responsible for providing Division employees with various operational and administrative services related to the Division's budget; supply procurement, personnel and hiring; and building safety and comfort. It ensures that other agency departments have the necessary resources to carry out the Division's regulatory mission.

15.1 Mission

The Administration Department's mission is to ensure:

- The availability of adequate funding to carry out the Division's mission;
- The efficient, accurate and secure receipt of revenue associated with fees, fines and assessments;
- Communication of and compliance with federal, state and collective bargaining labor requirements;
- The availability of knowledgeable, motivated and trained human resources capable of carrying out the Division's mission;
- The timely payment of all Division fiscal obligations;
- The best value procurement of goods and services;
- The safety and security of employees, visitors, and property; and
- A comfortable work environment for employees and visitors.

15.2 2017 Goals

• Complete billing of assessments according to timelines and collect all open receivables before fiscal year-end, while ensuring compliance with state Comptroller guidelines and the Division's Internal Control Plan.



• Timely and accurately collect all revenue while ensuring compliance with state Comptroller guidelines and the Division's Internal Control Plan.



 Timely complete all hiring and staffing requests to ensure available human resources to carry out the Division's mission.



 Draft and issue requests for responses seeking qualified vendors to perform necessary professional services on the Division's behalf. Participate in evaluating and qualifying vendors from pool of bidders. Ensure procurements are conducted in compliance with Operational Services Division requirements.



Appendix A – Acts, Regulations & Bulletins

2017 Acts

Chapter 47- AN ACT MAKING APPROPRIATIONS FOR THE FISCAL YEAR 2018 FOR THE MAINTENANCE OF THE DEPARTMENTS, BOARDS, COMMISSIONS, INSTITUTIONS AND CERTAIN ACTIVITIES OF THE COMMONWEALTH, FOR INTEREST, SINKING FUND AND SERIAL BOND REQUIREMENTS AND FOR CERTAIN PERMANENT IMPROVEMENTS.

Line item 1595-6379 of the budget, as contained in Section 2E of the Act, relating to the motor vehicle insurance merit rating board, provides, in relevant part, that notwithstanding any general or special law to the contrary, no safe driver insurance plan shall require the payment of an unsafe driver point surcharge for the first offense for a noncriminal motor vehicle traffic violation as described in M.G.L. c. 90C.

Section 76 of the Act added a new section 1138 ½ to M.G.L. c. 175. The new section defines a minor motor vehicle accident generally as one that results in a claim payment, exclusive of any deductible, that exceeds \$1000 but is not more than \$5000. The section further defines a major motor vehicle accident as one that results in a claim payment, exclusive of any deductible, that exceeds \$5000.

Section 77 of the Act amended M.G.L. c. 175E, §4 by adding language stating that motor vehicle insurance premiums cannot be increased due to an at-fault accident unless the accident meets the criteria for a minor or major accident as defined by M.G.L. c. 175, §113B ½.

Section 130 of the Act provides that the Health Policy Commission, in consultation with the Department of Public Health and the Division, shall study and analyze health insurance payer practices that require certain categories of drugs to be dispensed by a third-party specialty pharmacy directly to a patient or health care provider with the direction that the drugs are to be used for a specific patient and not for the general use of the provider. The Commission must submit a report of its findings and proposed legislation with the House and Senate Ways and Means, the Joint Committee on Health Care Financing and the Joint Committee on Public Health no later than July 1, 2018.

Chapter 110 - AN ACT MAKING APPROPRIATIONS FOR THE FISCAL YEAR 2017 TO PROVIDE FOR SUPPLEMENTING CERTAIN EXISTING APPROPRIATIONS AND FOR CERTAIN OTHER ACTIVITIES AND PROJECTS.

Section 23 of the Act amended Chapter 224 of the acts of 2012 by adding a new section 254A. Chapter 224 requires the Commissioner to promulgate regulations to enforce the provisions of the federal Mental Health Parity and Addiction Equity Act and applicable state mental health parity laws and requires that carriers and their contractors submit an annual report to the Division and to the attorney general, certifying and outlining how their health benefit plans comply with the federal Mental Health Parity and Addiction Equity Act and

applicable state mental health parity laws. New section 254A added definitions of certain behavioral health services and related definitions, and added a requirement that the annual report submitted by carriers and

contractors state whether their coverage includes certain mental health home-based and community based services for a child. The Commissioner is authorized to promulgate regulations or guidelines to implement the new section.

Line item 8324-0000 of the budget, as contained in Section 38 of the Act, concerning the Department of Fire Services, provides, in relevant part, that the entire amount appropriated in the line item for the operation of the hazardous materials emergency response program and the associated fringe benefits costs of personnel paid from that item for those purposes are funded entirely by assessments upon insurance companies writing commercial multiple peril, non-liability portion policies on property in MA and certain commercial auto policies. Section 38 added that 100% of the amount appropriated in the budget line item for the administration of the Department of Fire Services, the State Fire Marshal's office, the MA firefighting academy, critical incident stress management programs, the On-Site Academy, other fire training academies, the regional dispatch centers, the radio and dispatch center improvements and associated fringe benefits costs of personnel paid from that line item will also be assessed upon the insurance companies assessed in this item.

2017 Regulations

211 CMR 40.00: Marketing of Insured Health Plans.

This regulation was amended to strike references to the Health Care Financing Administration and substitute the Centers for Medicare & Medicaid Services to conform to the federal agency's name change.

211 CMR 43.00: Health Maintenance Organizations.

This regulation was amended to simplify administration of the market by reducing regulatory duplication and enabling the Division, when possible, to obtain HMO reporting information from sources other than the particular regulated party.

211 CMR 52.00: Managed Care Consumer Protections and Accreditation of Carriers.

This regulation was amended to implement requirements mandated by the federal Affordable Care Act and Massachusetts legislative changes to the managed care statutes.

211 CMR 56.00: Reductions in Premium Charges for Private Passenger Motor Vehicle Insurance for Insureds Electing Optional Participating Repair Shop Endorsement Plans.

This regulation was amended to establish new electronic filing requirements and to include revisions for consistency and clarity relative to the approval of repair shop endorsements.

211 CMR 66.00: Small Group Health Insurance.

This regulation was amended to conform to statutory changes, many of which resulted from the gradual implementation of the federal Affordable Care Act since 2012.

211 CMR 71.00: Medicare Supplement Insurance to Facilitate the Implementation of M.G.L. c. 176K and Section 1882 of the Federal Social Security Act.

This regulation was amended to include modifications to comply with mental health parity laws and to simplify and clarify rate manual requirements.

211 CMR 79.00: Private Passenger Motor Vehicle Insurance Rates.

This regulation was amended to remove references to procedures that applied only to the transition period from a market in which the Commissioner fixed-and-established private passenger motor vehicle insurance rates to a competitive market.

211 CMR 88.00: Procedures for the Appeal of Insurer At-Fault Accident Determinations and the Conduct of Hearings on Insurer At-Fault Accident Determinations.

This regulation was amended in order to improve its readability, organization, and ease-of-use.

211 CMR 111.00: Workers' Compensation Insurance Requirements Applicable to Employee Leasing Companies and Their Client Companies.

This regulation was amended to provide additional clarity to mandates that employee leasing companies properly obtain adequate workers' compensation insurance and that premiums are commensurate with the exposure and anticipated claims experience.

211 CMR 134.00: Safe Driver Insurance and Merit Rating Plans.

This regulation was amended to reflect 2015 legislation requiring the Merit Rating Board to adopt new definitions of what constitutes minor and major accidents. Other amendments included changes to clarify the regulation and its application in fixed-and-established rating and competitive markets.

211 CMR 142.00 Insurance Sales by Banks and Credit Unions.

This regulation was amended in order to add the term "lender" to the regulation, remove references to repealed legislation and include revisions for consistency and clarity.

211 CMR 147.00: Methodology for Calculating and Reporting Medical Loss Ratios (MLRs) of Health Benefit Plans.

This regulation was amended to conform the regulation to the recent legislative changes to its enabling statute.

211 CMR 148.00: Registration and Reporting Requirements for Third Party Administrators.

The regulation was amended to simplify registration and reporting requirements for third party administrators to enable the Division to obtain reporting information from sources other than the particular regulated party.

2017 Bulletins

Bulletin 2017-01: Billing of Insured Health Plan Premiums for Individual Coverages.

This Bulletin was issued to inform health carriers doing business in Massachusetts that the Division expects all carriers to permit those in covered individual health plans to make premium payments in a non-electronic manner and to pay premiums monthly or less than monthly by choice of the covered person.

Bulletin 2017-02: Common Summary of Payments Format.

This Bulletin was issued to provide standards for common summary of payment forms and standard methods of delivery of those forms. It also prohibits carriers from specifying or describing sensitive health care services in the summary of payment forms, and requires the Division to define sensitive health care services in a later guidance.

Bulletin 2017-03: Addendum to 2017 "Guide to Health Insurance for People with Medicare", and the Attachment to the Bulletin, the Massachusetts Bulletin for People with Medicare 2017.

This Bulletin was issued to provide a downloadable PDF version of the "2017 Guide to Health Insurance for People with Medicare" and the Massachusetts specific addendum.

Bulletin 2017-04: Using Standard Prior Authorization Forms when Reviewing Requests for Hepatitis C Medication, Non-OB Ultrasound and SYNAGIS, and three attachments.

This Bulletin was issued to inform health carriers about the use of standard prior authorization forms when reviewing requests for certain medications and imaging services. A collaborative of representatives from carriers, provider groups and associations developed and submitted a series of standard prior authorization forms for use in reviewing requests for Hepatitis C Medication, Non-OB Ultrasound and SYNAGIS. The Bulletin requires the use of certain forms attached to the bulletin for these purposes.

Bulletin 2017-05: Guidance Regarding Open Enrollment Period for Benefit Year 2018.

This Bulletin was issued to provide guidance in connection with the 2018 open enrollment period, which ran from November 1, 2017 through January 23, 2018.

Bulletin 2017-06: Clarification of Coordination of Benefits under 211 CMR 38 for Medical Claims Associated with Motor Vehicle Accidents.

This Bulletin was issued to provide guidance relative to Coordination of Benefits under 211 CMR 38.00 for medical claims associated with motor vehicle accidents.

Bulletin 2017-07: Sensitive Health Care Services Definition

This Bulletin was issued to supplement Bulletin 2017-02, which required the Division to define sensitive health care services. The Bulletin lists health care services that are "sensitive health care services."

Bulletin 2017-08: Coverage for Abuse Deterrent Opioid Drug Products.

This Bulletin was issued to remind carriers that Chapter 258 of the Acts of 2016 requires that, if health insurance is considered "creditable coverage" under the law then the health insurance must provide coverage for abuse deterrent opioid drug products without an increase in patient cost sharing. The Bulletin also reminds carriers that they are to provide coverage for any abuse deterrent opioid drug product listed on the formulary.

Appendix B - Select 2017 Financial Information from Massachusetts Domestic Insurance Companies

Property & Casualty Insurance Companies

NAIC#	Company Name	Total Premium Written in MA 2017	Total Premium Written 2017	Total Net Assets as of 12/31/2017	Total Liabilities as of 12/31/2017	Total Surplus as of 12/31/2017
10017	Arbella Ind Ins Co	16,745,451	18,172,705	53,134,421	35,890,584	17,243,837
10206	Medical Professional Mut Ins Co	72,841,317	73,566,317	3,134,663,446	1,495,794,518	1,638,868,928
10394	Bunker Hill Ins Co	36,481,424	47,103,860	55,739,956	21,097,378	34,642,578
10664	Endeavour Ins Co	4,827,786	4,827,786	6,286,550	15,089	6,271,461
11104	Associated Employers Ins Co	32,999,478	34,503,042	6,774,505	792,614	5,981,891
11984	Independence Cas Ins Co	21,981,945	21,981,945	4,737,227	12,729	4,724,498
12154	Encompass Ins Co of MA	11,924,666	11,924,666	6,084,681	134,992	5,949,689
12484	Liberty Mut Personal Ins Co	1,752,707	1,752,707	12,846,915	38,059	12,808,856
12725	New England Mut Ins Co	11,066,685	14,355,880	46,229,220	4,065,280	42,163,940
12808	Safety Prop & Cas Ins Co	23,386,593	24,023,771	47,227,802	27,611,457	19,616,345
12886	Massachusetts Employers Ins Co	14,281,271	14,281,271	4,370,237	698,710	3,671,527
13163	Hospitality Mut Ins Co	10,418,739	10,418,739	68,859,508	41,686,335	27,173,173
13374	Arrow Mut Liab Ins Co	5,756,817	6,257,717	45,880,954	15,453,260	30,427,694
13463	Barnstable Cnty Mut Ins Co	26,954,747	26,954,747	112,653,951	21,833,273	90,820,678
13643	Bunker Hill Ins Cas Co	8,471,933	8,471,933	12,222,852	5,833,944	6,388,908
13706	Dorchester Mut Ins Co	39,056,298	39,300,980	99,706,781	53,099,739	46,607,042
13943	Fitchburg Mut Ins Co	2,012	37,893,653	140,224,703	74,569,902	65,654,801
14192	Hingham Mut Fire Ins Co	10,441,664	10,606,779	68,774,359	24,734,595	44,039,765
14486	Liberty Mut Mid Atlantic Ins Co	-	184,702,808	22,825,822	2,482,340	20,343,482
14613	Montgomery Mut Ins Co	-	22,578,296	53,962,828	1,268,509	52,694,320
14737	Plymouth Rock Assur Corp	335,353,153	370,231,803	684,238,834	461,703,099	222,535,735

		5,151,689,804	7,819,561,619	64,721,314,117	41,331,907,018	23,389,407,103
44326	Atlantic Charter Ins Co	37,193,810	40,646,881	178,415,661	121,850,146	56,565,51
41955	Barnstable Cnty Ins Co	2,696,138	2,696,138	25,017,410	2,322,374	22,695,03
41360	Arbella Protection Ins Co	179,034,346	205,057,382	325,680,731	221,101,530	104,579,20
40274	Citation Ins Co	224,263,936	224,263,936	256,546,196	185,443,397	71,102,79
39454	Safety Ins Co	628,934,471	649,819,615	1,503,638,603	886,061,267	617,577,3
37346	Danbury Ins Co	1,547,857	1,547,857	13,193,758	5,224,963	7,968,7
36226	United Cas & Surety Ins Co	2,131,822	2,314,033	10,492,366	2,489,303	8,003,0
34754	Commerce Ins Co	1,513,232,950	1,538,925,434	2,246,053,568	1,619,726,194	626,327,3
33758	Associated Industries Of MA Mut Ins	100,855,401	107,324,879	625,160,507	388,138,663	237,021,8
33618	Safety Ind Ins Co	147,105,578	153,472,345	127,620,269	66,638,517	60,981,7
31887	Coface N Amer Ins Co	2,145,003	105,657,514	135,930,414	88,861,742	47,068,6
23965	Norfolk & Dedham Mut Fire Ins Co	148,031,586	154,109,061	453,780,087	244,509,685	209,270,4
23043	Liberty Mut Ins Co	439,011,851	1,988,540,581	46,020,754,541	31,489,431,268	14,531,323,2
21750	Pilgrim Ins Co	74,614,800	74,614,800	101,458,958	80,037,672	21,421,2
21261	Electric Ins Co	22,800,934	268,579,419	1,424,054,016	932,585,495	491,468,5
19798	Merrimack Mut Fire Ins Co	157,247,183	345,100,207	1,728,180,646	627,541,745	1,100,638,8
19771	Cambridge Mut Fire Ins Co	7,373,841	115,836,856	1,012,389,213	432,860,274	579,528,9
19763	Bay State Ins Co	45,309,907	74,503,014	573,150,134	205,233,962	367,916,1
17000	Arbella Mut Ins Co	564,176,420	564,176,420	1,462,567,754	841,496,692	621,071,0
16037	Bunker Hill Security Ins Co	1,849,499	1,849,499	11,653,722	5,760,406	5,893,3
16036	Bunker Hill Prop Ins Co	1,653,320	1,653,320	11,580,668	5,686,726	5,893,9
16035	Bunker Hill Preferred Ins Co	1,514,752	1,514,752	11,605,346	5,711,396	5,893,9

TOTAL

Life Insurance Companies

		Total Premium Written in MA	Total Premium Written	Total Net Assets as of	Total Liabilities as of	Total Surplus as of
NAIC#	Company Name	20172017	20172017	12/31/20172017	12/31/20172017	12/31/20172017
61476	Boston Mut Life Ins Co	39,018,168	172,792,625	1,430,482,028	1,221,114,773	209,367,255
65935	Massachusetts Mut Life Ins Co	253,363,898	8,257,215,001	240,063,222,121	224,358,005,468	15,705,216,653
66265	Monarch Life Ins Co	30,647	1,037,909	669,483,207	665,141,068	4,342,135
67598	Paul Revere Life Ins Co	482,552	13,170,026	3,570,570,280	3,393,227,829	177,342,451
69140	First Allmerica Fin Life Ins Co	654,364	58,407,090	3,420,263,110	3,179,958,457	240,304,653
70435	The Savings Bank Mut Life Ins Co of	157,860,185	351,713,907	3,032,422,202	2,829,899,680	202,522,522
71714	Berkshire Life Ins Co of Amer	602,071	9,456,643	3,717,674,076	3,528,577,118	189,096,958
74920	Regal Reins Co	-	-	6,795,822	268,222	6,527,598
80896	Centre Life Ins Co	-	-	1,790,730,064	1,697,123,094	93,606,970
84824	Commonwealth Ann & Life Ins Co	2,894,610	54,533,462	11,301,517,797	8,813,270,031	2,488,247,766
91626	New England Life Ins Co	15,561,311	203,387,041	10,160,610,197	9,678,082,730	482,527,467
93610	John Hancock Life & Hlth Ins Co	70,253	1,127,110	14,006,751,955	13,114,832,015	891,919,940
	TOTAL	470,538,059	9,122,840,814	293,170,522,859	272,479,500,485	20,691,022,368

Health Insurance Companies

NAIC#	Company Name	Total Premium Written in MA 2017	Total Premium Written 2017	Total Net Assets as of 12/31/2017	Total Liabilities as of 12/31/2017	Total Surplus as of 12/31/2017
11109	Neighborhood Hlth Plan Inc	2,424,164,366	2,424,164,366	562,823,263	225,697,595	337,125,668
12210	Dentegra Ins Co of New England	3,001,255	3,042,281	6,970,857	846,540	6,124,317
12219	BCBS of MA HMO Blue Inc	4,828,645,027	4,828,645,027	2,411,705,167	1,028,041,087	1,383,664,080
13203	Boston Medical Center HIth Plan Inc	1,282,119,639	1,620,771,261	463,543,566	230,306,273	233,237,293
13632	Celticare Hith Plan of MA Inc	173,888,206	173,888,206	69,318,635	35,382,654	33,935,981
14131	Tufts Hith Public Plans Inc	1,825,826,488	1,830,683,559	581,779,238	334,449,008	247,330,230
14198	HNE Ins Co	663,761	663,761	5,120,337	111,362	5,008,975
15497	DSM MA Ins Co Inc	12,517,000	12,517,000	10,925,231	1,352,797	9,572,434
18975	HPHC Ins Co Inc	389,751,742	784,908,363	249,228,638	178,811,153	70,417,485
52060	Dental Service of MA Inc	251,403,422	251,403,422	422,920,818	79,783,547	343,137,272
53228	BCBS of MA	2,843,291,083	2,843,291,083	2,547,980,452	1,652,958,468	895,021,984
60117	Tufts Ins Co Inc	247,851,397	278,780,892	98,868,881	46,261,726	52,607,155
66828	Fallon Hith & Life Assur Co	28,726,154	28,726,154	23,965,084	17,502,079	6,463,005
95299	Connecticare Of MA Inc	4,600,607	4,600,607	2,710,738	760,801	1,949,937
95541	Fallon Comm Hith Plan Inc	1,242,326,184	1,242,326,184	383,644,463	220,525,192	163,119,271
95673	Health New England Inc	895,485,839	899,904,508	224,898,351	140,974,749	83,923,602
95688	Tufts Associated Hlth Maintenance Or	2,515,245,433	2,555,327,305	1,086,814,845	442,529,024	644,286,474
96717	Harvard Pilgrim Health Care New Eng	-	563,281,685	141,956,951	85,917,222	56,039,729
96911	Harvard Pilgrim HIth Care Inc	1,348,089,350	1,647,892,821	917,833,886	440,026,382	477,807,504
	TOTAL	\$20,317,596,953	\$ 21,994,818,485	\$ 10,213,009,401	\$ 5,162,237,659	\$ 5,050,772,396

Fraternal Organizations

NAIC#	Company Name	Total Premium Written in MA 2017	Total Premium Written 2017	Total Net Assets as of 12/31/2017	Total Liabilities as of 12/31/2017	Total Surplus as of 12/31/2017
58130	Catholic Assn Of Foresters	109,985	135,073	12,686,406	7,106,489	5,579,917
58181	Supreme Council The Royal Arcanum	3,501,386	7,120,629	110,994,099	98,575,251	12,418,848
	TOTAL	3,611,371	7,255,702	123,680,505	105,681,740	17,998,765

Workers' Compensation Self-Insured Groups

Self-Insurance Group Name	Gross Premium Written 2017	Net Premium Written 2017	Total Assets as of 12/31/2017	Total Liabilities as of 12/31/2017	Total Surplus as of 12/31/2017
ABC Massachusetts Workers Compensation Self-Insurance Group, Inc.	\$3,460,872	\$2,829,826	\$4,870,313	\$4,870,313	\$-
Automotive Industries Compensation Corp.	8,349,652	7,673,506	5,542,018	5,542,018	-
Commonwealth Manufacturers Compensation Corporation (runoff since 1/1/1996)	-	-	125,883	125,883	-
Commonwealth Transportation Compensation Corporation (runoff since 1/31/2016)	227,540	238,844	1,039,343	1,039,343	-
Construction Industries Compensation Corporation (runoff since 1/1/2010)	-	-	1,069,097	1,271,902	(202,807)
Diocesan Facilities Self-Insurance Group, Inc.	1,210,009	1,045,571	1,940,404	1,798,426	141,978
HVAC Compensation Corp.	1,175,171	1,067,825	2,498,989	2,498,989	-
Independent Schools Compensation Corporation	9,516,047	9,088,167	19,861,755	19,860,519	1,236
Manufacturers of Massachusetts Compensation Group (runoff since 1/1/2012)	-	-	1,399,448	1,399,448	-
Massachusetts Bay Self-Insurance Group, Inc	3,181,175	2,895,885	7,066,059	6,837,274	228,786
Massachusetts Care Self-Insurance Group, Inc.	4,869,718	4,473,951	7,723,621	7,723,621	-

Massachusetts Catholic Self-Insurance Group, Inc. Y/E- 3/31/2017	3,095,819	2,867,175	15,590,994	7,233,847	8,357,147
"Massachusetts Education and Government Assn. Property- Casualty Group					
(MEGA) Y/E- 6/30/2017"	15,196,888	14,288,751	25,071,508	22,690,296	2,381,212
Massachusetts Healthcare Self-Insurance Group, Inc.	7,206,209	6,406,146	5,808,057	5,808,057	-
Massachusetts High Technology Self-Insurance Group	919,165	760,002	1,818,625	1,818,625	-
Massachusetts Manufacturing Self-Insurance Group, Inc.	4,219,386	3,922,133	7,391,552	7,291,552	100,000
Massachusetts McDonald's Operators Workers' Compensation Group, Inc.	1,934,262	1,761,055	3,560,704	3,560,704	-
Massachusetts NAHRO Insurance Group, Inc.	5,724,507	4,888,481	12,573,994	9,942,525	2,631,469
Massachusetts Retail Merchants Workers' Comp. Self-Insurance Group, Inc.	23,732,842	21,253,780	35,200,035	35,200,035	-
Massachusetts Trade Self-Insurance Group, Inc.	4,435,555	3,920,569	7,521,810	7,521,810	-
MIIA Property-Casualty Group, Inc. Y/E- 6/30/2017	82,135,502	64,130,316	268,309,318	158,012,496	110,296,822
NEEIA Compensation, Inc.	8,609,101	8,277,449	23,525,177	23,525,177	1
Self Insured Lumber Businesses Assn, Inc.	3,889,835	3,420,945	6,589,660	6,547,693	41,967
(STAM) School Transportation Assn. of MA Self-Insurance Group, Inc.	3,813,161	3,456,916	7,267,010	7,267,010	-
TOTAL	\$196,902,416	\$168,667,293	\$473,685,111	\$349,707,300	\$123,977,811

Appendix C – 2017 Direct Written Premium by Line of Insurance

ACCIDENT & HEALTH INSURANCE

		_	Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
79413	UnitedHealthcare Ins Co	CT	1,191,965,128	34.94%		
60054	Aetna Life Ins Co	CT	261,858,694	7.68%		
65978	Metropolitan Life Ins Co	NY	211,451,453	6.20%	Total Companies	
67369	Cigna Hlth & Life Ins Co	CT	211,228,634	6.19%	Writing in Massachusetts	211
62235	Unum Life Ins Co Of Amer	ME	158,265,830	4.64%		
64246	Guardian Life Ins Co Of Amer	NY	84,101,932	2.47%		
70025	Genworth Life Ins Co	DE	73,913,407	2.17%		
80802	US Br Sun Life Assur Co of Canada	MI	68,634,030	2.01%		
65498	Life Ins Co Of N Amer	PA	61,356,948	1.80%		
65838	John Hancock Life Ins Co USA	MI	58,472,436	1.71%	Top 20 Companies	\$2,803,307,116
60380	American Family Life Assur Co of Col	NE	57,423,548	1.68%	Direct Written Premium	82.2%
69019	Standard Ins Co	OR	52,945,138	1.55%		
65315	Liberty Life Assur Co Of Boston	NH	52,807,217	1.55%	Remaining Companies	\$ 608,336,827
62049	Colonial Life & Accident Ins Co	SC	46,661,311	1.37%	Direct Written Premium	17.8%
68381	Reliance Standard Life Ins Co	IL	39,797,431	1.17%		
70815	Hartford Life & Accident Ins Co	СТ	38,918,439	1.14%	Total	
61271	Principal Life Ins Co	IA	35,764,290	1.05%	Direct Written Premium	\$ 3,411,643,943
68241	Prudential Ins Co Of Amer	NJ	33,642,623	0.99%		
67091	Northwestern Mut Life Ins Co	WI	32,217,874	0.94%		
65935	Massachusetts Mut Life Ins Co	MA	31,880,753	0.93%		

AIRCRAFT (ALL PERILS)

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
19445	National Union Fire Ins Co Of Pitts	PA	2,322,222	13.33%		
38318	Starr Ind & Liab Co	TX	2,258,101	12.96%		
35300	Allianz Global Risks US Ins Co	IL	1,486,719	8.54%	Total Companies	
37885	XL Specialty Ins Co	DE	1,154,634	6.63%	Writing in Massachusetts	26
20052	National Liab & Fire Ins Co	СТ	1,096,265	6.29%		
22667	Ace Amer Ins Co	PA	1,096,262	6.29%		
40045	Starnet Ins Co	DE	952,185	5.47%		
24147	Old Republic Ins Co	PA	917,115	5.27%		
10641	Endurance Amer Ins Co	DE	875,632	5.03%		
13604	Starr Surplus Lines Ins Co	IL	850,346	4.88%	Top 20 Companies	\$ 17,103,140
19720	American Alt Ins Corp	DE	794,685	4.56%	Direct Written Premium	98.2%
33022	AXA Ins Co	NY	701,465	4.03%		
34274	Central States Ind Co Of Omaha	NE	420,486	2.41%	Remaining Companies	\$ 314,014
10945	Tokio Marine Amer Ins Co	NY	406,361	2.33%	Direct Written Premium	1.8%
29700	North Amer Elite Ins Co	NH	330,519	1.90%		
39217	QBE Ins Corp	PA	309,885	1.78%	Total	
20362	Mitsui Sumitomo Ins Co of Amer	NY	297,132	1.71%	Direct Written Premium	\$ 17,417,154
10367	Avemco Ins Co	MD	280,989	1.61%		
29599	US Specialty Ins Co	TX	279,923	1.61%		
34037	Hallmark Ins Co	AZ	272,214	1.56%		

ANNUITIES

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
69345	Teachers Ins & Ann Assoc Of Amer	NY	708,214,824	10.17%		
91596	New York Life Ins & Ann Corp	DE	571,077,500	8.20%		
65056	Jackson Natl Life Ins Co	MI	531,557,975	7.63%	Total Companies	
86509	Voya Retirement Ins & Ann Co	СТ	460,572,463	6.61%	Writing in Massachusetts	164
65935	Massachusetts Mut Life Ins Co	MA	337,255,992	4.84%		
65676	Lincoln Natl Life Ins Co	IN	281,880,312	4.05%		
62944	AXA Equitable Life Ins Co	NY	267,242,682	3.84%		
61689	Athene Ann & Life Co	IA	241,899,675	3.47%		
90611	Allianz Life Ins Co Of N Amer	MN	229,781,152	3.30%		
68675	Security Benefit Life Ins Co	KS	207,205,998	2.98%	Top 20 Companies	\$5,293,718,733
60488	American Gen Life Ins Co	TX	198,364,522	2.85%	Direct Written Premium	76.0%
65005	RiverSource Life Ins Co	MN	180,079,397	2.59%		
61271	Principal Life Ins Co	IA	171,808,743	2.47%	Remaining Companies	\$1,670,838,278
91642	Forethought Life Ins Co	IN	159,280,419	2.29%	Direct Written Premium	24.0%
79227	Pruco Life Ins Co	AZ	148,293,867	2.13%		
68241	Prudential Ins Co Of Amer	NJ	134,805,622	1.94%	Total	
67466	Pacific Life Ins Co	NE	127,478,062	1.83%	Direct Written Premium	\$6,964,557,011
79065	Delaware Life Ins Co	DE	114,537,527	1.64%		
93696	Fidelity Investments Life Ins Co	UT	111,677,857	1.60%		
87726	Brighthouse Life Ins Co	DE	110,704,144	1.59%		

BOILER & MACHINERY

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
21482	Factory Mut Ins Co	RI	9,434,534	28.57%		
20281	Federal Ins Co	IN	3,027,676	9.17%		
10014	Affiliated Fm Ins Co	RI	1,825,167	5.53%	Total Companies	
25674	Travelers Prop Cas Co Of Amer	СТ	1,733,931	5.25%	Writing in Massachusetts	111
19445	National Union Fire Ins Co Of Pitts	PA	1,400,932	4.24%		
20443	Continental Cas Co	IL	1,370,024	4.15%		
19380	American Home Assur Co	NY	1,183,069	3.58%		
43001	Narragansett Bay Ins Co	RI	849,165	2.57%		
11452	Hartford Steam Boil Inspec & Ins Co	СТ	833,601	2.52%		
29700	North Amer Elite Ins Co	NH	801,249	2.43%	Top 20 Companies	\$28,013,360
23035	Liberty Mut Fire Ins Co	WI	738,681	2.24%	Direct Written Premium	84.8%
16535	Zurich Amer Ins Co	NY	717,664	2.17%		
19259	Selective Ins Co Of SC	IN	638,062	1.93%	Remaining Companies	\$5,006,617
25658	Travelers Ind Co	СТ	608,389	1.84%	Direct Written Premium	15.2%
26247	American Guar & Liab Ins	NY	580,855	1.76%		
31325	Acadia Ins Co	NH	580,478	1.76%	Total	
20303	Great Northern Ins Co	IN	556,201	1.68%	Direct Written Premium	\$33,019,977
35300	Allianz Global Risks US Ins Co	IL	430,885	1.30%		
20397	Vigilant Ins Co	NY	359,791	1.09%		
25844	Union Ins Co	IA	343,006	1.04%		

BURGLARY & THEFT

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
31194	Travelers Cas & Surety Co Of Amer	СТ	1,767,952	21.93%		
16535	Zurich Amer Ins Co	NY	1,350,729	16.76%		
20281	Federal Ins Co	IN	939,970	11.66%	Total Companies	
19445	National Union Fire Ins Co Of Pitts	PA	700,493	8.69%	Writing in Massachusetts	103
10200	Hiscox Ins Co Inc	IL	575,294	7.14%		
29599	US Specialty Ins Co	TX	338,384	4.20%		
22292	Hanover Ins Co	NH	255,398	3.17%		
20443	Continental Cas Co	IL	240,725	2.99%		
10120	Everest Natl Ins Co	DE	177,547	2.20%		
10030	Westchester Fire Ins Co	PA	161,316	2.00%	Top 20 Companies	\$7,462,553
29700	North Amer Elite Ins Co	NH	157,656	1.96%	Direct Written Premium	92.6%
23647	Ironshore Ind Inc	MN	125,020	1.55%		
29580	Berkley Regional Ins Co	DE	98,941	1.23%	Remaining Companies	
19682	Hartford Fire Ins Co	СТ	97,809	1.21%	Direct Written Premium	\$597,790
41181	Universal Underwriters Ins Co	IL	88,768	1.10%		7.4%
22306	Massachusetts Bay Ins Co	NH	85,682	1.06%	Total	
20346	Pacific Ind Co	WI	82,789	1.03%	Direct Written Premium	\$8,060,343
27154	Atlantic Specialty Ins Co	NY	78,759	0.98%		
18058	Philadelphia Ind Ins Co	PA	69,900	0.87%		
29459	Twin City Fire Ins Co Co	IN	69,421	0.86%		

COMMERCIAL AUTO

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
34754	Commerce Ins Co	MA	117,169,391	13.70%		
39454	Safety Ins Co	MA	85,460,044	10.00%		
41360	Arbella Protection Ins Co	MA	80,500,003	9.41%	Total Companies	
21750	Pilgrim Ins Co	MA	53,249,474	6.23%	Writing in Massachusetts	194
33618	Safety Ind Ins Co	MA	36,573,424	4.28%		
18058	Philadelphia Ind Ins Co	PA	31,640,015	3.70%		
41840	Allmerica Fin Benefit Ins Co	MI	16,872,164	1.97%		
19046	Travelers Cas Ins Co Of Amer	СТ	14,946,903	1.75%		
24260	Progressive Cas Ins Co	ОН	14,871,053	1.74%		
31325	Acadia Ins Co	NH	14,350,556	1.68%	Top 20 Companies	\$578,620,204
23035	Liberty Mut Fire Ins Co	WI	14,021,211	1.64%	Direct Written Premium	67.7%
14788	NGM Ins Co	FL	13,279,740	1.55%		
16535	Zurich Amer Ins Co	NY	12,924,463	1.51%	Remaining Companies	
40274	Citation Ins Co	MA	12,113,259	1.42%	Direct Written Premium	\$276,401,718
25615	Charter Oak Fire Ins Co	СТ	11,938,009	1.40%		32.3%
25658	Travelers Ind Co	СТ	11,103,393	1.30%	Total	
32620	National Interstate Ins Co	ОН	10,705,039	1.25%	Direct Written Premium	\$855,021,922
24082	Ohio Security Ins Co	NH	9,314,089	1.09%		
25674	Travelers Prop Cas Co Of Amer	СТ	8,949,506	1.05%		
25844	Union Ins Co	IA	8,638,468	1.01%		

COMMERCIAL MULTI-PERIL

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
18058	Philadelphia Ind Ins Co	PA	74,558,911	6.74%		
25992	Northern Security Ins Co Inc	VT	59,600,094	5.38%		
23965	Norfolk & Dedham Mut Fire Ins Co	MA	46,042,778	4.16%	Total Companies	
20281	Federal Ins Co	IN	43,821,646	3.96%	Writing in Massachusetts	217
31534	Citizens Ins Co Of Amer	MI	33,526,381	3.03%		
24082	Ohio Security Ins Co	NH	32,373,362	2.92%		
29939	Main St Amer Assur Co	FL	30,583,169	2.76%		
15067	Quincy Mut Fire Ins Co	MA	25,085,312	2.27%		
19046	Travelers Cas Ins Co Of Amer	СТ	25,083,869	2.27%		
26018	Vermont Mut Ins Co	VT	22,896,252	2.07%	Top 20 Companies	\$592,524,708
25666	Travelers Ind Co Of Amer	СТ	22,424,663	2.03%	Direct Written Premium	53.5%
25623	Phoenix Ins Co	СТ	22,100,854	2.00%		
22306	Massachusetts Bay Ins Co	NH	21,802,103	1.97%	Remaining Companies	
25674	Travelers Prop Cas Co Of Amer	СТ	21,031,629	1.90%	Direct Written Premium	\$514,459,407
22292	Hanover Ins Co	NH	20,476,007	1.85%		46.5%
11000	Sentinel Ins Co Ltd	СТ	19,901,480	1.80%	Total	
23876	Mapfre Ins Co	NJ	19,730,666	1.78%	Direct Written Premium	\$1,106,984,115
25615	Charter Oak Fire Ins Co	СТ	18,436,856	1.67%		
39454	Safety Ins Co	MA	17,395,412	1.57%		
19682	Hartford Fire Ins Co	СТ	15,653,264	1.41%		

CREDIT

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
27154	Atlantic Specialty Ins Co	NY	7,882,423	20.12%		
16691	Great Amer Ins Co	ОН	7,816,007	19.95%		
20516	Euler Hermes N Amer Ins Co	MD	5,949,452	15.19%	Total Companies	
26565	Ohio Ind Co	ОН	3,036,882	7.75%	Writing in Massachusetts	25
26344	Great Amer Assur Co	ОН	2,968,518	7.58%		
31887	Coface N Amer Ins Co	MA	2,145,003	5.48%		
25422	Atradius Trade Credit Ins Co	MD	1,598,200	4.08%		
29980	First Colonial Ins Co	FL	1,586,154	4.05%		
23728	National Gen Ins Co	MO	1,346,310	3.44%		
11150	Arch Ins Co	MO	1,131,527	2.89%	Top 20 Companies	\$39,045,915
39217	QBE Ins Corp	PA	771,612	1.97%	Direct Written Premium	99.7%
29599	US Specialty Ins Co	TX	606,645	1.55%		
24147	Old Republic Ins Co	PA	462,915	1.18%	Remaining Companies	
20699	Ace Prop & Cas Ins Co	PA	392,586	1.00%	Direct Written Premium	\$131,948
37885	XL Specialty Ins Co	DE	370,750	0.95%		0.3%
25011	Wesco Ins Co	DE	345,924	0.88%	Total	
10847	Cumis Ins Society Inc	IA	251,053	0.64%	Direct Written Premium	\$39,177,863
10111	American Bankers Ins Co Of FL	FL	172,539	0.44%		
13722	Knightbrook Ins Co	DE	108,010	0.28%		
10952	Transamerica Cas Ins Co	ОН	103,405	0.26%		

DEPOSIT FUNDS

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
61271	Principal Life Ins Co	IA	164,240,517	27.46%		
93629	Prudential Retirement Ins & Ann Co	СТ	74,123,044	12.39%		
65935	Massachusetts Mut Life Ins Co	MA	55,672,904	9.31%	Total Companies	
65056	Jackson Natl Life Ins Co	MI	54,014,804	9.03%	Writing in Massachusetts	76
68136	Protective Life Ins Co	TN	53,024,832	8.86%		
69019	Standard Ins Co	OR	38,199,392	6.39%		
88072	Hartford Life Ins Co	СТ	32,809,394	5.48%		
69345	Teachers Ins & Ann Assoc Of Amer	NY	17,296,437	2.89%		
70238	Variable Ann Life Ins Co	TX	16,029,586	2.68%		
69868	United Of Omaha Life Ins Co	NE	10,806,924	1.81%	Top 20 Companies	\$569,284,659
65978	Metropolitan Life Ins Co	NY	10,000,000	1.67%	Direct Written Premium	95.2%
91596	New York Life Ins & Ann Corp	DE	7,944,791	1.33%		
68608	Symetra Life Ins Co	IA	6,836,416	1.14%	Remaining Companies	
66583	National Guardian Life Ins Co	WI	6,586,677	1.10%	Direct Written Premium	\$28,887,130
68241	Prudential Ins Co Of Amer	NJ	5,907,576	0.99%		4.8%
63312	Great Amer Life Ins Co	ОН	3,962,202	0.66%	Total	
60054	Aetna Life Ins Co	СТ	3,277,580	0.55%	Direct Written Premium	\$598,171,789
87726	Brighthouse Life Ins Co	DE	3,194,796	0.53%		
67644	Penn Mut Life Ins Co	PA	2,690,883	0.45%		
60739	American Natl Ins Co	TX	2,665,904	0.45%		

FIDELITY & SURETY

			Premium	Market Share	
NAIC#	Company Name	State	Written in MA	in MA	
23043	Liberty Mut Ins Co	MA	30,575,141	16.03%	
31194	Travelers Cas & Surety Co Of Amer	СТ	27,267,787	14.29%	
20281	Federal Ins Co	IN	16,970,500	8.90%	Total Companies
39306	Fidelity & Deposit Co Of MD	MD	16,367,870	8.58%	Writing in Massachusetts
3188	Western Surety Co	SD	14,891,162	7.81%	
6691	Great Amer Ins Co	ОН	4,688,492	2.46%	
9682	Hartford Fire Ins Co	СТ	4,367,519	2.29%	
11150	Arch Ins Co	MO	4,177,677	2.19%	
29874	North Amer Specialty Ins Co	NH	4,172,894	2.19%	
19445	National Union Fire Ins Co Of Pitts	PA	3,933,825	2.06%	Top 20 Companies
22292	Hanover Ins Co	NH	3,755,626	1.97%	Direct Written Premium
24074	Ohio Cas Ins Co	NH	3,559,863	1.87%	
14788	NGM Ins Co	FL	3,352,798	1.76%	Remaining Companies
32603	Berkley Ins Co	DE	3,246,272	1.70%	Direct Written Premium
18058	Philadelphia Ind Ins Co	PA	3,234,535	1.70%	
16535	Zurich Amer Ins Co	NY	2,670,694	1.40%	Total
10030	Westchester Fire Ins Co	PA	2,377,381	1.25%	Direct Written Premium
36226	United Cas & Surety Ins Co	MA	2,131,822	1.12%	
1592	International Fidelity Ins Co	NJ	1,851,106	0.97%	
20443	Continental Cas Co	IL	1,814,884	0.95%	

FIRE

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
41360	Arbella Protection Ins Co	MA	32,308,824	12.30%		
34754	Commerce Ins Co	MA	21,774,934	8.29%		
19798	Merrimack Mut Fire Ins Co	MA	14,115,622	5.37%	Total Companies	
26018	Vermont Mut Ins Co	VT	13,226,143	5.04%	Writing in Massachusetts	195
10014	Affiliated Fm Ins Co	RI	12,563,272	4.78%		
29700	North Amer Elite Ins Co	NH	11,972,648	4.56%		
21482	Factory Mut Ins Co	RI	10,199,805	3.88%		
19380	American Home Assur Co	NY	9,889,626	3.76%		
23035	Liberty Mut Fire Ins Co	WI	8,680,311	3.30%		
42978	American Security Ins Co	DE	8,651,154	3.29%	Top 20 Companies	\$192,896,711
25658	Travelers Ind Co	CT	8,068,221	3.07%	Direct Written Premium	73.4%
17000	Arbella Mut Ins Co	MA	6,215,922	2.37%		
26298	Metropolitan Prop & Cas Ins Co	RI	5,073,303	1.93%	Remaining Companies	
16535	Zurich Amer Ins Co	NY	4,957,008	1.89%	Direct Written Premium	\$69,775,970
11185	Foremost Ins Co Grand Rapids MI	MI	4,950,551	1.88%		26.6%
13803	Farm Family Cas Ins Co	NY	4,688,241	1.78%	Total	
33022	AXA Ins Co	NY	4,343,001	1.65%	Direct Written Premium	\$262,672,681
39454	Safety Ins Co	MA	4,283,868	1.63%		
19429	Insurance Co Of The State Of PA	IL	3,560,531	1.36%		
26247	American Guar & Liab Ins	NY	3,373,726	1.28%		

FRATERNALS

			Premium	Market Share		
NAIC#	Company Name	StateV	Vritten in MA	in MA		
58033	Knights Of Columbus	СТ	33,674,283	46.50%		
56014	Thrivent Financial For Lutherans	WI	20,514,474	28.33%		
58068	Independent Order Of Foresters Us Br	NY	8,692,948	12.00%	Total Companies	
58181	Supreme Council The Royal Arcanum	MA	3,501,386	4.83%	Writing in Massachusetts	26
57541	Modern Woodmen Of Amer	IL	2,076,060	2.87%		
57010	William Penn Assn	PA	729,362	1.01%		
56030	Catholic Financial Life	WI	668,768	0.92%		
57487	Catholic Order Of Foresters	IL	508,244	0.70%		
56332	First Cath Slovak Ladies Assn USA	ОН	388,779	0.54%		
56340	First Cath Slovak Union Of US & CN	ОН	329,745	0.46%	Top 20 Companies	\$72,379,931
57622	Polish Natl Alliance Us Of Na	IL	295,591	0.41%	Direct Written Premium	99.9%
57967	Luso Amer Life Ins Society	CA	266,521	0.37%		
57630	Polish Roman Catholic Union Of Amer	IL	160,310	0.22%	Remaining Companies	
57320	Woodmen World Life Ins Soc	NE	158,910	0.22%	Direct Written Premium	\$38,028
57770	Catholic Holy Family Society	IL	110,975	0.15%		0.1%
58130	Catholic Assn Of Foresters	MA	109,985	0.15%	Total	
56820	Polish Falcons Of Amer	PA	83,896	0.12%	Direct Written Premium	\$72,417,959
56383	Order of United Commercial Travelers	ОН	70,128	0.10%		
57142	Sons Of Norway	MN	25,975	0.04%		
57193	Slovak Catholic Sokol	NJ	13,591	0.02%		

HEALTH

			Premium	Market Share
NAIC#	Company Name	State	Written in MA	in MA
12219	BCBS OF MA HMO BLUE INC	MA	4,828,645,027	23.16%
53228	BCBS OF MA	MA	2,843,291,083	13.64%
95688	TUFTS ASSOCIATED HLTH MAINTENANCE OR	MA	2,515,245,433	12.06%
11109	NEIGHBORHOOD HLTH PLAN INC	MA	2,424,164,366	11.63%
14131	TUFTS HLTH PUBLIC PLANS INC	MA	1,825,826,488	8.76%
96911	HARVARD PILGRIM HLTH CARE INC	MA	1,348,089,350	6.47%
13203	BOSTON MEDICAL CENTER HLTH PLAN INC	MA	1,282,119,637	6.15%
95541	FALLON COMM HLTH PLAN INC	MA	1,242,326,184	5.96%
95673	HEALTH NEW ENGLAND INC	MA	897,847,405	4.31%
18975	HPHC INS CO INC	MA	389,751,742	1.87%
52060	DENTAL SERV OF MA INC	MA	251,403,422	1.21%
60117	TUFTS INS CO INC	MA	247,851,397	1.19%
13632	CELTICARE HLTH PLAN OF MA INC	MA	173,888,206	0.83%
95149	UNITEDHEALTHCARE OF NEW ENGLAND INC	RI	137,689,516	0.66%
12575	SILVERSCRIPT INS CO	TN	107,506,398	0.52%
73288	HUMANA INS CO	WI	88,181,768	0.42%
52632	ALTUS DENTAL INS CO INC	RI	61,130,887	0.29%
39616	VISION SERV PLAN INS CO	ОН	37,497,766	0.18%
10155	WELLCARE PRESCRIPTION INS INC	FL	36,544,613	0.18%
66828	FALLON HLTH & LIFE ASSUR CO	MA	28,726,154	0.14%
3	FALLON HLTH & LIFE ASSUR CO	MA	28,726,154	0.14%

HOMEOWNERS' MULTI-PERIL

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
40274	Citation Ins Co	MA	199,743,046	8.52%		
17000	Arbella Mut Ins Co	MA	136,960,033	5.85%		
34754	Commerce Ins Co	MA	119,145,628	5.09%	Total Companies	
19798	Merrimack Mut Fire Ins Co	MA	105,085,396	4.48%	Writing in Massachusetts	147
33618	Safety Ind Ins Co	MA	101,648,066	4.34%		
19976	Amica Mut Ins Co	RI	93,743,998	4.00%		
26018	Vermont Mut Ins Co	VT	86,120,471	3.68%		
23035	Liberty Mut Fire Ins Co	WI	84,311,637	3.60%		
36447	LM Gen Ins Co	IL	56,597,447	2.42%		
26298	Metropolitan Prop & Cas Ins Co	RI	54,273,615	2.32%	Top 20 Companies	\$1,504,865,205
23043	Liberty Mut Ins Co	MA	52,934,544	2.26%	Direct Written Premium	64.2%
43001	Narragansett Bay Ins Co	RI	52,922,555	2.26%		
39454	Safety Ins Co	MA	52,046,492	2.22%	Remaining Companies	
15067	Quincy Mut Fire Ins Co	MA	49,756,965	2.12%	Direct Written Premium	\$838,185,730
20346	Pacific Ind Co	WI	48,231,091	2.06%		35.8%
10969	United Prop & Cas Ins Co	FL	47,249,814	2.02%	Total	
25941	United Serv Automobile Assn	TX	42,738,116	1.82%	Direct Written Premium	\$2,343,050,935
15024	Preferred Mut Ins Co	NY	41,671,995	1.78%		
31534	Citizens Ins Co Of Amer	MI	41,275,921	1.76%		
19402	AIG Prop Cas Co	PA	38,408,375	1.64%		

LIABILITY OTHER THAN AUTO

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
20281	Federal Ins Co	IN	109,280,172	7.66%		
19445	National Union Fire Ins Co Of Pitts	PA	107,481,894	7.53%		
20443	Continental Cas Co	IL	64,403,297	4.51%	Total Companies	
37885	XL Specialty Ins Co	DE	53,667,179	3.76%	Writing in Massachusetts	334
22667	Ace Amer Ins Co	PA	50,487,679	3.54%		
41360	Arbella Protection Ins Co	MA	39,828,066	2.79%		
31194	Travelers Cas & Surety Co Of Amer	СТ	39,503,214	2.77%		
16535	Zurich Amer Ins Co	NY	37,716,191	2.64%		
18058	Philadelphia Ind Ins Co	PA	32,879,924	2.30%		
25674	Travelers Prop Cas Co Of Amer	СТ	29,430,274	2.06%	Top 20 Companies	\$756,956,475
22292	Hanover Ins Co	NH	23,967,836	1.68%	Direct Written Premium	53.1%
10120	Everest Natl Ins Co	DE	22,530,392	1.58%		
37273	Axis Ins Co	IL	19,984,845	1.40%	Remaining Companies	
10641	Endurance Amer Ins Co	DE	19,605,067	1.37%	Direct Written Premium	\$669,506,500
23035	Liberty Mut Fire Ins Co	WI	19,402,153	1.36%		46.9%
38318	Starr Ind & Liab Co	TX	18,015,748	1.26%	Total	
11150	Arch Ins Co	MO	17,647,135	1.24%	Direct Written Premium	\$1,426,462,975
37540	Beazley Ins Co Inc	СТ	17,572,445	1.23%		
29599	US Specialty Ins Co	TX	17,047,223	1.20%		
26247	American Guar & Liab Ins	NY	16,505,741	1.16%		

LIFE

NAIC#			Premium	Market Share		
	Company Name	State	Written in MA	in MA		
67091 N	Northwestern Mut Life Ins Co	WI	290,488,215	7.69%		
65935 N	Massachusetts Mut Life Ins Co	MA	253,363,898	6.70%		
66915 N	New York Life Ins Co	NY	216,438,389	5.73%	Total Companies	
65978 N	Metropolitan Life Ins Co	NY	207,231,415	5.48%	Writing in Massachusetts	283
65676 L	Lincoln Natl Life Ins Co	IN	172,415,479	4.56%		
65838 J	John Hancock Life Ins Co USA	MI	166,815,977	4.41%		
64246	Guardian Life Ins Co Of Amer	NY	161,981,720	4.29%		
70435 T	The Savings Bank Mut Life Ins Co of	MA	157,860,184	4.18%		
79227 F	Pruco Life Ins Co	AZ	122,320,220	3.24%		
68241 F	Prudential Ins Co Of Amer	NJ	104,691,986	2.77%	Top 20 Companies	\$2,437,473,412
87726 E	Brighthouse Life Ins Co	DE	99,508,379	2.63%	Direct Written Premium	64.5%
70815 H	Hartford Life & Accident Ins Co	CT	73,188,502	1.94%		
91596 N	New York Life Ins & Ann Corp	DE	62,187,711	1.65%	Remaining Companies	
60488 A	American Gen Life Ins Co	TX	57,496,128	1.52%	Direct Written Premium	\$1,341,838,927
65005 F	RiverSource Life Ins Co	MN	50,186,276	1.33%		35.5%
80314 L	Unicare Life & Hlth Ins Co	IN	49,265,939	1.30%	Total	
62235 L	Unum Life Ins Co Of Amer	ME	48,379,241	1.28%	Direct Written Premium	\$3,779,312,339
67466 F	Pacific Life Ins Co	NE	48,252,194	1.28%		
86231 T	Transamerica Life Ins Co	IA	47,781,478	1.26%		
65498 L	Life Ins Co Of N Amer	PA	47,620,081	1.26%		

LIFE ALL LINES

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
65935	Massachusetts Mut Life Ins Co	MA	1,553,256,134	8.92%		
79413	UnitedHealthcare Ins Co	СТ	1,192,978,985	6.85%		
65978	Metropolitan Life Ins Co	NY	1,077,082,609	6.18%	Total Companies	
65838	John Hancock Life Ins Co USA	MI	896,955,367	5.15%	Writing in Massachusetts	304
69345	Teachers Ins & Ann Assoc Of Amer	NY	724,219,241	4.16%		
86509	Voya Retirement Ins & Ann Co	CT	648,062,611	3.72%		
91596	New York Life Ins & Ann Corp	DE	633,265,211	3.63%		
65056	Jackson Natl Life Ins Co	MI	550,774,822	3.16%		
65676	Lincoln Natl Life Ins Co	IN	479,901,252	2.75%		
67091	Northwestern Mut Life Ins Co	WI	377,482,982	2.17%	Top 20 Companies	\$10,975,786,954
68241	Prudential Ins Co Of Amer	NJ	360,199,883	2.07%	Direct Written Premium	63.0%
66869	Nationwide Life Ins Co	ОН	316,871,885	1.82%		
62944	AXA Equitable Life Ins Co	NY	304,552,303	1.75%	Remaining Companies	
66915	New York Life Ins Co	NY	296,552,081	1.70%	Direct Written Premium	\$6,447,138,781
60054	Aetna Life Ins Co	СТ	286,878,903	1.65%		37.0%
79227	Pruco Life Ins Co	AZ	270,614,087	1.55%	Total	
60488	American Gen Life Ins Co	TX	264,111,901	1.52%	Direct Written Premium	\$17,422,925,735
61689	Athene Ann & Life Co	IA	248,007,911	1.42%		
65005	RiverSource Life Ins Co	MN	247,705,507	1.42%		
64246	Guardian Life Ins Co Of Amer	NY	246,313,279	1.41%		

LIFE / OTHER FUNDS

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
65935	Massachusetts Mut Life Ins Co	MA	930,755,491	28.48%		
65838	John Hancock Life Ins Co USA	MI	667,085,302	20.41%		
65978	Metropolitan Life Ins Co	NY	571,626,928	17.49%	Total Companies	
66869	Nationwide Life Ins Co	ОН	245,872,648	7.52%	Writing in Massachusetts	22
86509	Voya Retirement Ins & Ann Co	СТ	185,265,214	5.67%		
92657	Nationwide Life & Ann Ins Co	ОН	108,766,686	3.33%		
70688	Transamerica Financial Life Ins Co	NY	99,102,376	3.03%		
68241	Prudential Ins Co Of Amer	NJ	87,059,652	2.66%		
86231	Transamerica Life Ins Co	IA	78,162,223	2.39%		
88668	Mutual Of Amer Life Ins Co	NY	56,978,153	1.74%		
66915	New York Life Ins Co	NY	55,351,406	1.69%	Top 20 Companies	\$3,267,633,829
93629	Prudential Retirement Ins & Ann Co	СТ	42,102,729	1.29%	Direct Written Premium	100.0%
69019	Standard Ins Co	OR	31,159,492	0.95%		
66168	Minnesota Life Ins Co	MN	30,326,771	0.93%	Remaining Companies	
66281	Transamerica Premier Life Ins Co	IA	26,164,355	0.80%	Direct Written Premium	\$608,758
88072	Hartford Life Ins Co	СТ	25,647,889	0.78%		0.0%
62626	CMFG Life Ins Co	IA	14,799,857	0.45%	Total	
62944	AXA Equitable Life Ins Co	NY	8,367,202	0.26%	Direct Written Premium	\$3,268,242,587
67172	Ohio Natl Life Ins Co	ОН	2,173,608	0.07%		
71153	Hartford Life & Ann Ins Co	СТ	865,847	0.03%		

MEDICAL MALPRACTICE

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
10206	Medical Professional Mut Ins Co	MA	71,992,322	59.86%		
11843	Medical Protective Co	IN	13,406,138	11.15%		
15890	Connecticut Medical Ins Co	СТ	12,344,407	10.26%	Total Companies	
20427	American Cas Co Of Reading PA	PA	7,303,459	6.07%	Writing in Massachusetts	36
10638	Proselect Ins Co	NE	3,328,778	2.77%		
14460	Podiatry Ins Co Of Amer	IL	1,865,661	1.55%		
19917	Liberty Ins Underwriters Inc	IL	1,827,023	1.52%		
34495	Doctors Co An Interins Exch	CA	1,469,093	1.22%		
22667	Ace Amer Ins Co	PA	1,466,926	1.22%		
15865	NCMIC Ins Co	IA	1,375,658	1.14%	Top 20 Companies	\$119,937,238
19445	National Union Fire Ins Co Of Pitts	PA	1,039,417	0.86%	Direct Written Premium	99.7%
35157	Fair Amer Ins & Reins Co	NY	896,537	0.75%		
22730	Allied World Ins Co	NH	383,581	0.32%	Remaining Companies	
10801	Fortress Ins Co	IL	302,925	0.25%	Direct Written Premium	\$336,505
13714	Pharmacists Mut Ins Co	IA	291,033	0.24%		0.3%
20443	Continental Cas Co	IL	247,432	0.21%	Total	
19720	American Alt Ins Corp	DE	137,360	0.11%	Direct Written Premium	\$120,273,743
36277	Medical Mut Ins Co Of ME	ME	99,052	0.08%		
16624	Allied World Specialty Ins Co	DE	83,936	0.07%		
27154	Atlantic Specialty Ins Co	NY	76,500	0.06%		

MORTGAGE & FINANCIAL GUARANTY

NAIC#	Company Name	State	Premium Written in MA	Market Share in MA		
29858	Mortgage Guar Ins Corp	WI	25,814,713	21.54%		
33790	Radian Guar Inc	PA	23,135,173	19.30%		
38458	Genworth Mortgage Ins Corp	NC	19,297,330	16.10%	Total Companies	
15873	United Guar Residential Ins Co	NC	15,780,834	13.17%	Writing in Massachusetts	17
40266	ARCH Mortgage Ins Co	WI	13,420,660	11.20%		
13634	Essent Guar Inc	PA	12,199,919	10.18%		
13695	National Mortgage Ins Corp	WI	3,262,585	2.72%		
28452	Republic Mortgage Ins Co	NC	2,162,734	1.80%		
18708	Ambac Assur Corp	WI	1,786,174	1.49%		
18287	Assured Guar Municipal Corp	NY	1,206,132	1.01%	Top 20 Companies	\$119,845,429
26999	United Guar Mortgage Ind Co	NC	1,041,487	0.87%	Direct Written Premium	100.0%
18732	Arch Mortgage Guar Co	WI	473,353	0.39%		
30180	Assured Guar Corp	MD	103,879	0.09%	Remaining Companies	
20311	Syncora Guar Inc	NY	56,216	0.05%	Direct Written Premium	\$-
12041	MBIA Ins Corp	NY	55,842	0.05%		0.0%
14380	Build Amer Mut Assur Co	NY	40,417	0.03%	Total	
29114	ARCH Mortgage Assur Co	WI	7,981	0.01%	Direct Written Premium	\$119,845,429

OCEAN & INLAND MARINE

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
19917	Liberty Ins Underwriters Inc	IL	78,138,424	12.81%		
20443	Continental Cas Co	IL	64,743,392	10.61%		
10952	Transamerica Cas Ins Co	ОН	24,217,016	3.97%	Total Companies	
11630	Jefferson Ins Co	NY	20,482,071	3.36%	Writing in Massachusetts	274
11991	National Cas Co	ОН	17,721,193	2.90%		
21113	United States Fire Ins Co	DE	17,173,641	2.81%		
22667	Ace Amer Ins Co	PA	16,335,136	2.68%		
19445	National Union Fire Ins Co Of Pitts	PA	15,399,897	2.52%		
12190	American Pet Ins Co	NY	12,908,641	2.12%		
25674	Travelers Prop Cas Co Of Amer	СТ	12,708,534	2.08%	Top 20 Companies	\$373,649,962
22292	Hanover Ins Co	NH	12,685,783	2.08%	Direct Written Premium	61.2%
21482	Factory Mut Ins Co	RI	12,080,544	1.98%		
27154	Atlantic Specialty Ins Co	NY	11,809,490	1.94%	Remaining Companies	
31325	Acadia Ins Co	NH	9,900,895	1.62%	Direct Written Premium	\$258,137,890
20346	Pacific Ind Co	WI	9,753,251	1.60%		42.3%
20281	Federal Ins Co	IN	8,102,053	1.33%	Total	
37885	XL Specialty Ins Co	DE	7,865,671	1.29%	Direct Written Premium	\$610,163,522
22837	AGCS Marine Ins Co	IL	7,340,034	1.20%		
11150	Arch Ins Co	МО	7,151,116	1.17%		
37923	GEICO Marine Ins Co	MD	7,133,180	1.17%		

PRIVATE PASSENGER AUTO

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
34754	Commerce Ins Co	MA	1,239,686,107	23.89%		
39454	Safety Ins Co	MA	454,424,346	8.76%		
22063	Government Employees Ins Co	MD	439,925,595	8.48%	Total Companies	
17000	Arbella Mut Ins Co	MA	408,349,928	7.87%	Writing in Massachusetts	52
23043	Liberty Mut Ins Co	MA	334,628,829	6.45%		
14737	Plymouth Rock Assur Corp	MA	329,700,570	6.35%		
36447	LM Gen Ins Co	IL	221,849,782	4.28%		
26298	Metropolitan Prop & Cas Ins Co	RI	214,442,663	4.13%		
16322	Progressive Direct Ins Co	ОН	181,756,394	3.50%		
19976	Amica Mut Ins Co	RI	153,877,103	2.97%	Top 20 Companies	\$4,816,299,810
31534	Citizens Ins Co Of Amer	MI	153,616,518	2.96%	Direct Written Premium	92.8%
19070	Standard Fire Ins Co	CT	148,238,865	2.86%		
35882	Geico Gen Ins Co	MD	135,651,082	2.61%	Remaining Companies	
15067	Quincy Mut Fire Ins Co	MA	77,098,994	1.49%	Direct Written Premium	\$514,280,980
19232	Allstate Ins Co	IL	71,790,016	1.38%		9.9%
25968	USAA Cas Ins Co	TX	55,260,571	1.07%	Total	
23965	Norfolk & Dedham Mut Fire Ins Co	MA	53,531,000	1.03%	Direct Written Premium	\$5,188,109,343
26018	Vermont Mut Ins Co	VT	50,425,435	0.97%		
24740	Safeco Ins Co Of Amer	NH	47,457,913	0.91%		
25941	United Serv Automobile Assn	TX	44,588,099	0.86%		

PROPERTY & CASUALTY TOTAL

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
34754	Commerce Ins Co	MA	1,513,232,950	10.81%		
39454	Safety Ins Co	MA	628,934,471	4.49%		
17000	Arbella Mut Ins Co	MA	564,176,420	4.03%	Total Companies	
22063	Government Employees Ins Co	MD	441,283,056	3.15%	Writing in Massachusetts	537
23043	Liberty Mut Ins Co	MA	439,011,851	3.14%		
14737	Plymouth Rock Assur Corp	MA	335,353,153	2.40%		
26298	Metropolitan Prop & Cas Ins Co	RI	282,522,925	2.02%		
36447	LM Gen Ins Co	IL	279,843,142	2.00%		
19976	Amica Mut Ins Co	RI	262,227,631	1.87%		
31534	Citizens Ins Co Of Amer	MI	241,447,444	1.73%	Top 20 Companies	\$6,837,222,185
20281	Federal Ins Co	IN	232,980,689	1.66%	Direct Written Premium	48.9%
40274	Citation Ins Co	MA	224,263,936	1.60%		
26018	Vermont Mut Ins Co	VT	190,206,981	1.36%	Remaining Companies	
16322	Progressive Direct Ins Co	ОН	183,589,127	1.31%	Direct Written Premium	\$7,157,601,853
19070	Standard Fire Ins Co	СТ	179,646,268	1.28%		51.1%
41360	Arbella Protection Ins Co	MA	179,034,346	1.28%	Total	
19445	National Union Fire Ins Co Of Pitts	PA	168,249,965	1.20%	Direct Written Premium	\$13,994,824,038
15067	Quincy Mut Fire Ins Co	MA	164,219,713	1.17%		
23035	Liberty Mut Fire Ins Co	WI	163,988,692	1.17%		
0						

SURPLUS LINES

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
19437	Lexington Ins Co	DE	56,700,222	8.03%		
35378	Evanston Ins Co	IL	40,025,764	5.67%		
36940	Indian Harbor Ins Co	DE	39,787,504	5.63%	Total Companies	
17370	Nautilus Ins Co	AZ	37,775,605	5.35%	Writing in Massachusetts	108
25445	Ironshore Specialty Ins Co	AZ	36,057,598	5.10%		
20079	National Fire & Marine Ins Co	NE	25,709,863	3.64%		
41297	Scottsdale Ins Co	ОН	25,464,993	3.60%		
27960	Illinois Union Ins Co	IL	23,425,104	3.32%		
26883	AIG Specialty Ins Co	IL	21,172,604	3.00%		
26387	Steadfast Ins Co	DE	17,754,470	2.51%	Top 20 Companies	\$455,018,563
13196	Western World Ins Co	NH	17,564,928	2.49%	Direct Written Premium	64.4%
31127	Columbia Cas Co	IL	15,225,551	2.16%		
42374	Houston Cas Co	TX	13,701,839	1.94%	Remaining Companies	
12203	James River Ins Co	ОН	13,586,689	1.92%	Direct Written Premium	\$251,398,069
24856	Admiral Ins Co	DE	13,481,544	1.91%		35.6%
41718	Endurance Amer Specialty Ins Co	DE	13,216,059	1.87%	Total	
37532	Great Amer E&S Ins Co	DE	11,635,330	1.65%	Direct Written Premium	\$706,416,632
32859	Penn Amer Ins Co	PA	11,357,862	1.61%		
10172	Westchester Surplus Lines Ins Co	GA	10,883,850	1.54%		
26620	AXIS Surplus Ins Co	IL	10,491,184	1.49%		

TITLE INSURANCE

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
0814	First Amer Title Ins Co	NE	90,495,730	30.26%		-
0520	Old Republic Natl Title Ins Co	FL	45,269,742	15.14%	Total Companies	
1268	Connecticut Attorneys Title Ins Co	VT	40,891,634	13.68%	Writing in Massachusetts	14
0229	Chicago Title Ins Co	FL	34,928,477	11.68%		
0083	Commonwealth Land Title Ins Co	FL	24,771,507	8.28%	Top 14 Companies	\$299,016,7
1586	Fidelity Natl Title Ins Co	FL	23,623,109	7.90%	Direct Written Premium	100.0%
0121	Stewart Title Guar Co	TX	23,488,652	7.86%		
0050	Westcor Land Title Ins Co	SC	6,262,827	2.09%	Remaining Companies	
1152	WFG Natl Title Ins Co	SC	4,711,658	1.58%	Direct Written Premium	\$-
016	Title Resources Guar Co	TX	2,745,509	0.92%		0.0%
1411	American Guar Title Ins Co	OK	991,715	0.33%	Total	
0130	North Amer Title Ins Co	CA	807,978	0.27%	Direct Written Premium	\$299,016,7
1632	EnTitle Ins Co	ОН	27,691	0.01%		
020	National Title Ins Of NY Inc	NY	538	0.00%		

WORKERS' COMPENSATION

			Premium	Market Share		
NAIC#	Company Name	State	Written in MA	in MA		
33758	Associated Industries Of MA Mut Ins	MA	100,855,401	8.03%		
22667	Ace Amer Ins Co	PA	57,358,917	4.57%		
23841	New Hampshire Ins Co	IL	47,733,265	3.80%	Total Companies	
25682	Travelers Ind Co Of CT	СТ	42,398,915	3.37%	Writing in Massachusetts	244
25666	Travelers Ind Co Of Amer	СТ	42,338,712	3.37%		
25658	Travelers Ind Co	СТ	41,444,104	3.30%		
44326	Atlantic Charter Ins Co	MA	37,193,810	2.96%		
30104	Hartford Underwriters Ins Co	СТ	34,921,851	2.78%		
42390	Amguard Ins Co	PA	33,015,255	2.63%		
11104	Associated Employers Ins Co	MA	32,999,478	2.63%	Top 20 Companies	\$732,811,032
40142	American Zurich Ins Co	IL	30,926,107	2.46%	Direct Written Premium	58.3%
25674	Travelers Prop Cas Co Of Amer	СТ	29,811,833	2.37%		
33600	LM Ins Corp	IL	27,605,918	2.20%	Remaining Companies	
23035	Liberty Mut Fire Ins Co	WI	26,914,589	2.14%	Direct Written Premium	\$523,542,858
31325	Acadia Ins Co	NH	26,397,986	2.10%		41.7%
16535	Zurich Amer Ins Co	NY	25,826,151	2.06%	Total	
29459	Twin City Fire Ins Co Co	IN	25,056,070	1.99%	Direct Written Premium	\$1,256,353,890
25011	Wesco Ins Co	DE	24,287,487	1.93%		
31470	Norguard Ins Co	PA	23,743,238	1.89%		
11984	Independence Cas Ins Co	MA	21,981,945	1.75%		